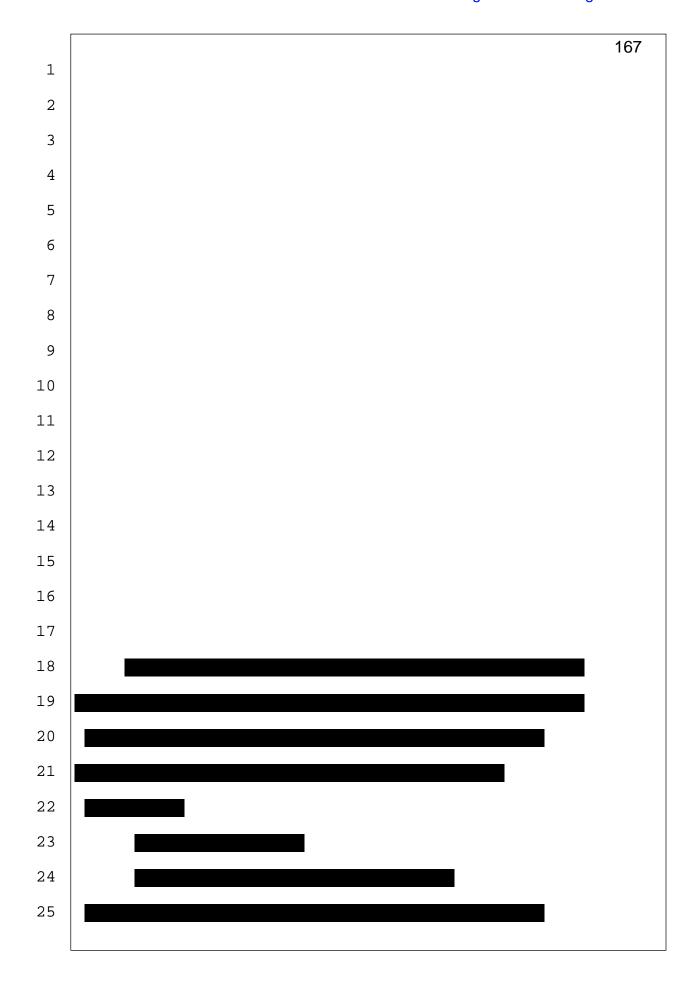
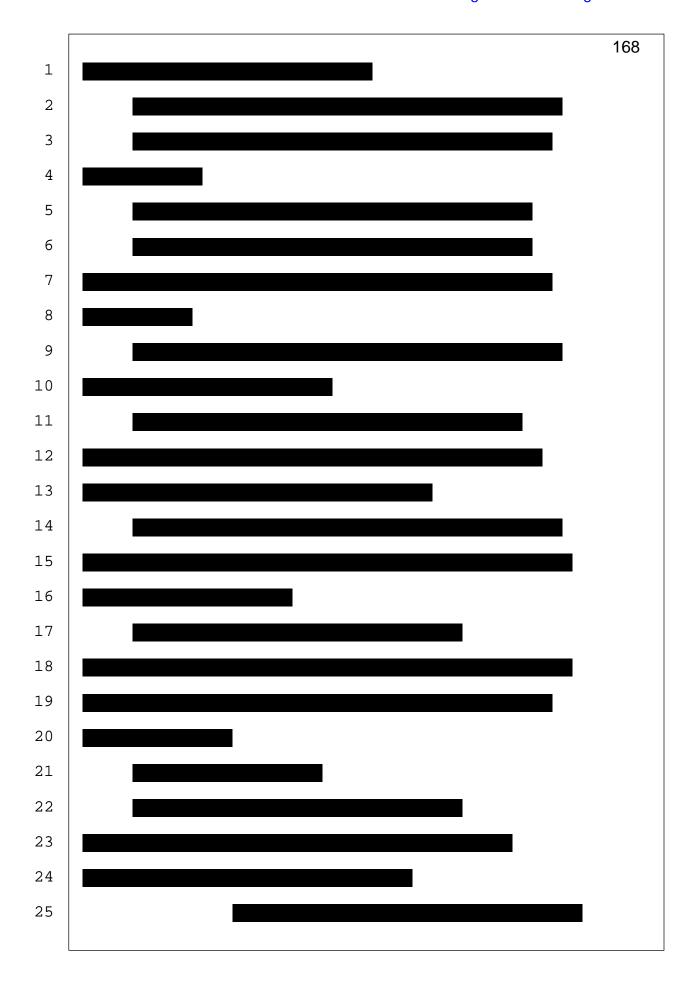
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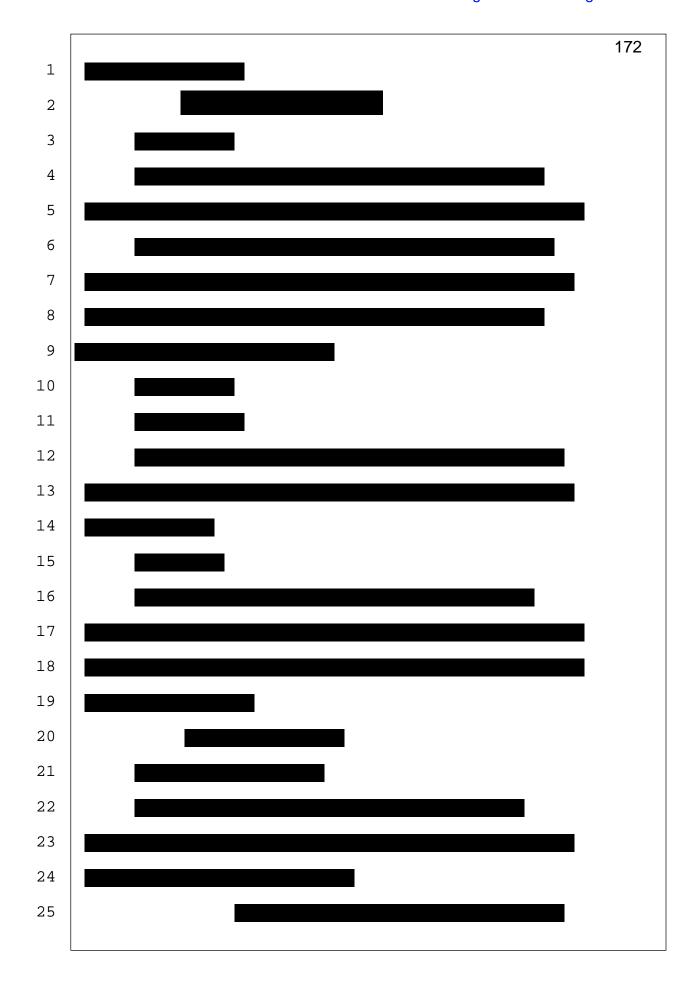
1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF DELAWARE 3 4 THOMSON REUTERS ENTERPRISE CENTRE GMBH and WEST 5 PUBLISHING CORPORATION, 6 Plaintiffs, Case Number: 7 vs. 8 ROSS INTELLIGENCE, INC., 9 Defendant. 10 11 12 13 Confidential Video Deposition of 14 LUTHER KARL BRANTING, Ph.D. 15 Wednesday, October 19, 2022 9:01 a.m. 16 17 18 19 20 21 22 23 Job No. 836111 24 Reported by: Laurie Donovan, RPR, CRR, CLR 25

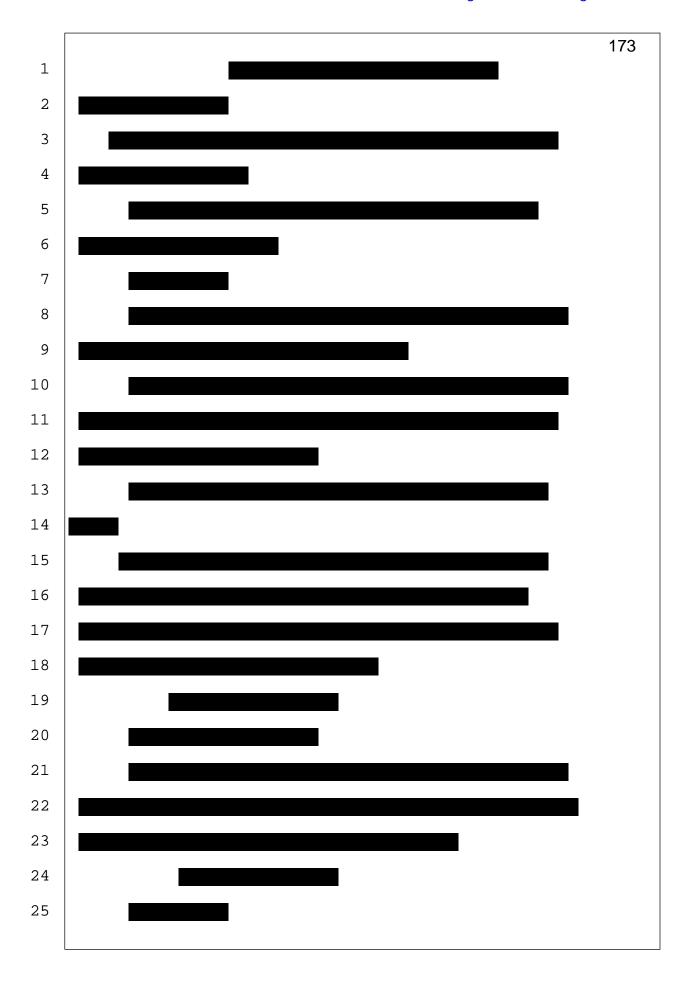
Ross Intelligence

October 19, 2022



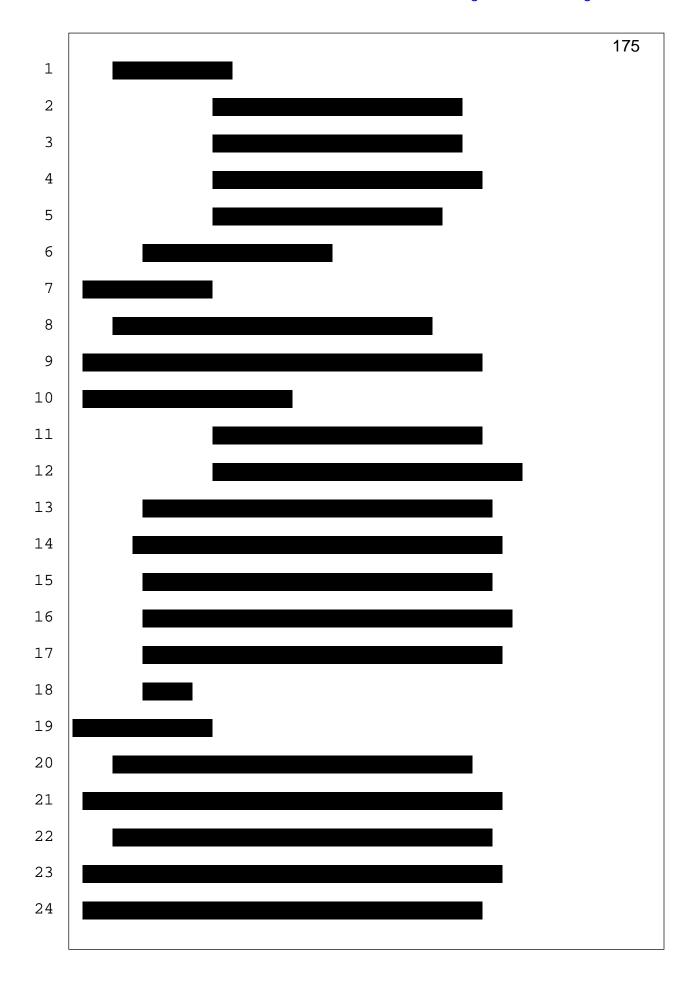


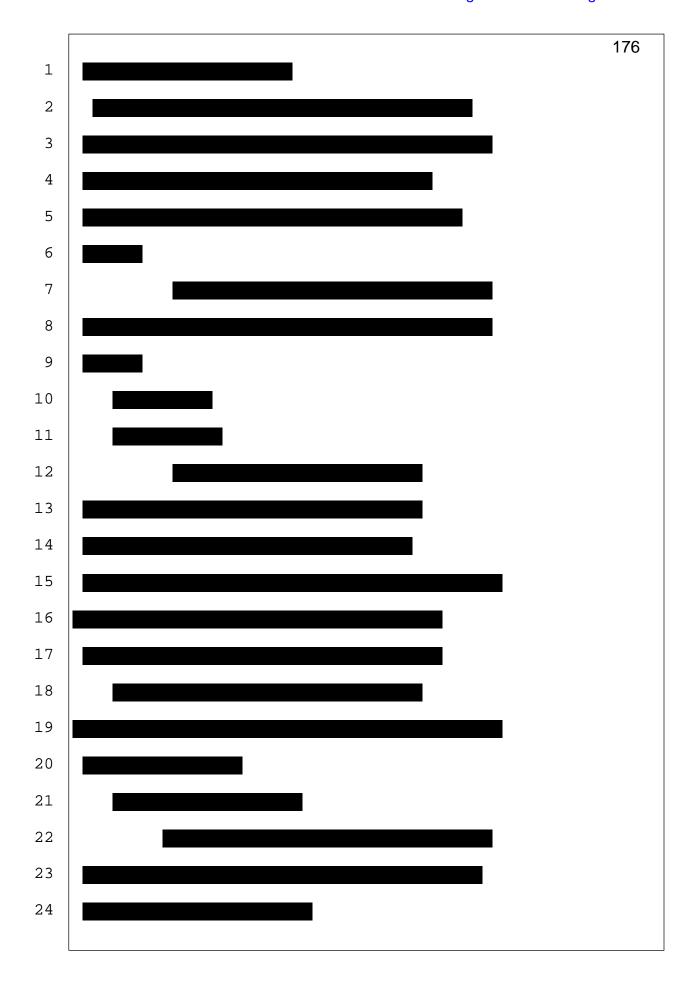




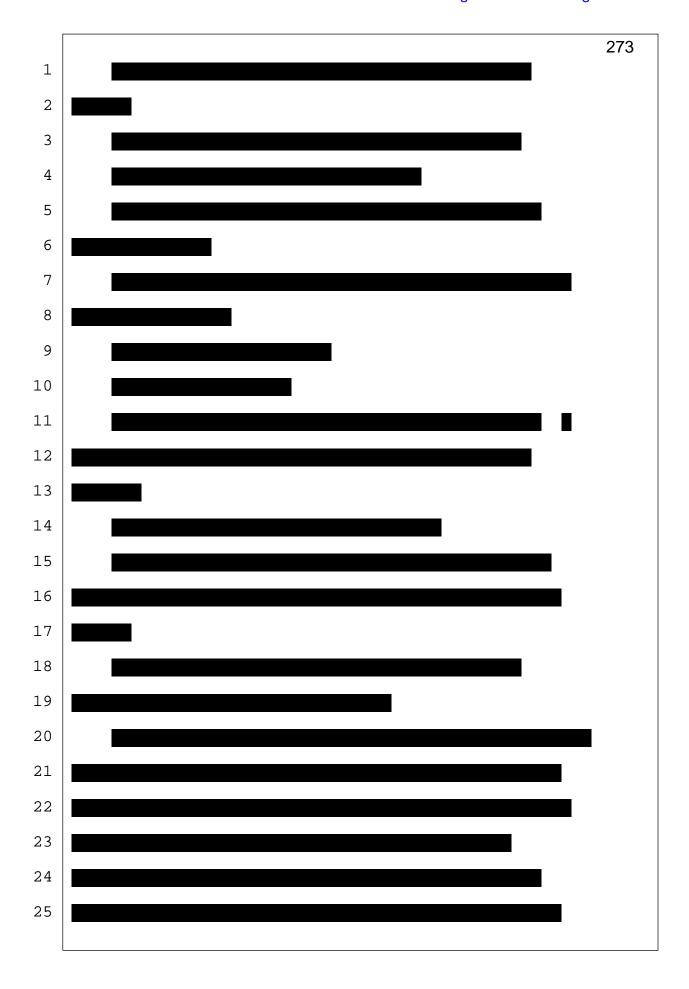
1 IN THE UNITED STATES DISTRICT COURT 2 FOR THE DISTRICT OF DELAWARE 3 C.A. No. 20-613(LPS) 4 5 6 IN RE MATTER OF: 7 THOMSON REUTERS ENTERPRISE 8 CENTRE GMBH and WEST PUBLISHING 9 CORPORATION, Plaintiffs and Counterdefendants 10 11 -vs-12 ROSS INTELLIGENCE INC., 13 Defendant and Counterclaimant. 14 15 16 17 18 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY 19 REMOTE TESTIMONY OF ALAN COX 20 NOVEMBER 2, 2022 - 8:30 A.M. PDT 21 22 23 24 JOB NO. 2022-866214

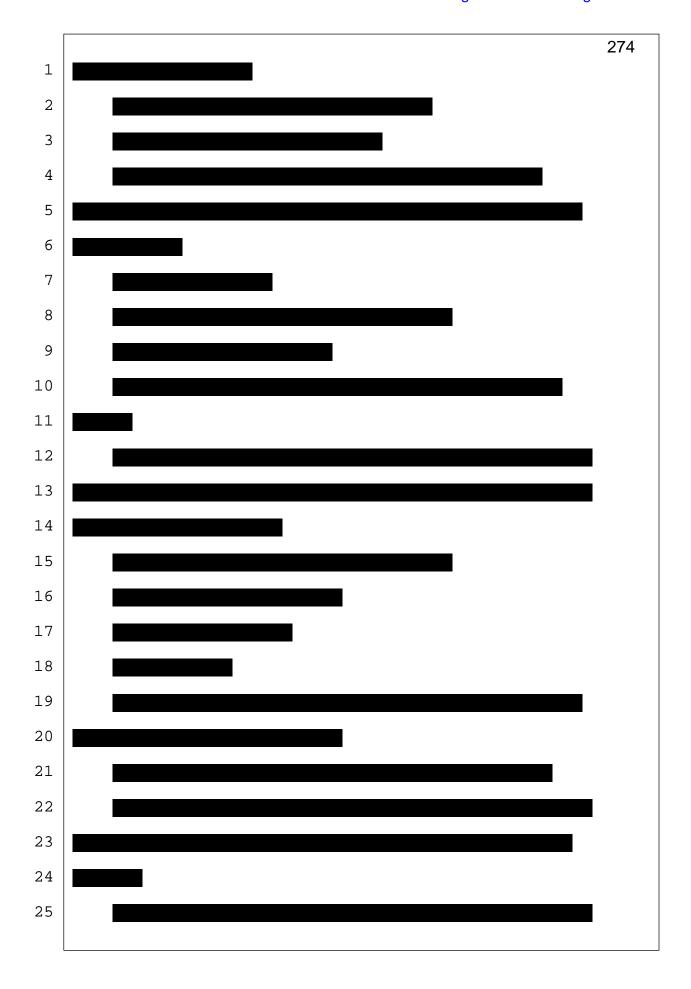
Ross Intelligence Inc.



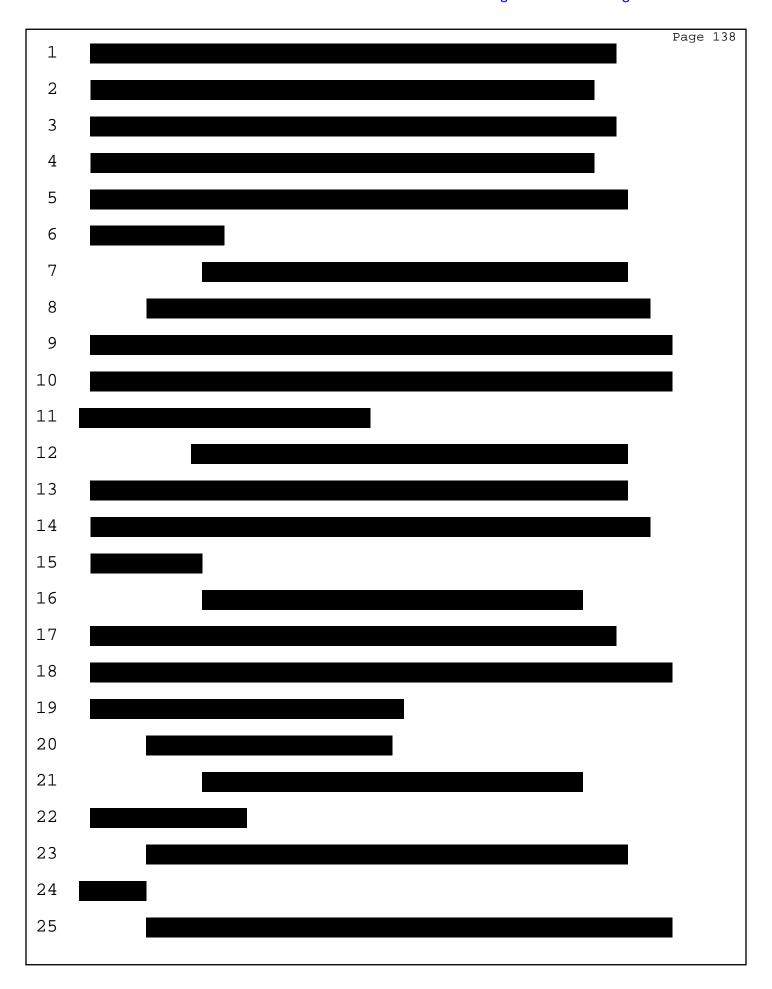


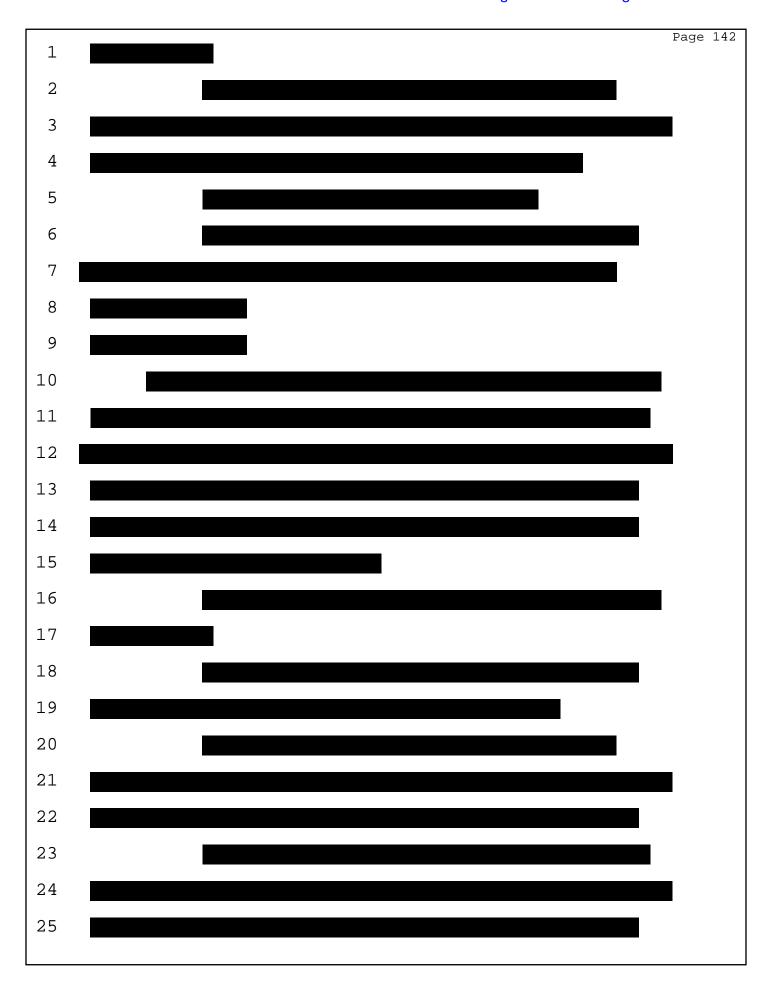
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             IN THE UNITED STATES DISTRICT COURT
 2
                FOR THE DISTRICT OF DELAWARE
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 4
    THOMSON REUTERS ENTERPRISE
    CENTRE GMBH and WEST
 5
    PUBLISHING CORPORATION,
 6
               Plaintiffs,
 7
                                    No. 1:20-cv-00613-UNA
         vs.
 8
    ROSS INTELLIGENCE INC.,
 9
               Defendant.
10
11
12
13
14
       VIDEO-RECORDED DEPOSITION OF
15
       BARBARA FREDERIKSEN-CROSS, at Regus Center,
16
       1050 SW Sixth Avenue, Suite 1100, Portland,
17
       Oregon, commencing at 9:21 a.m. PST, on
       Friday, November 11, 2022, before
18
19
       Marla Sharp, RPR, CLR, CCRR, CA CSR 11924,
       OR CSR 17-0446, WA CSR 3408.
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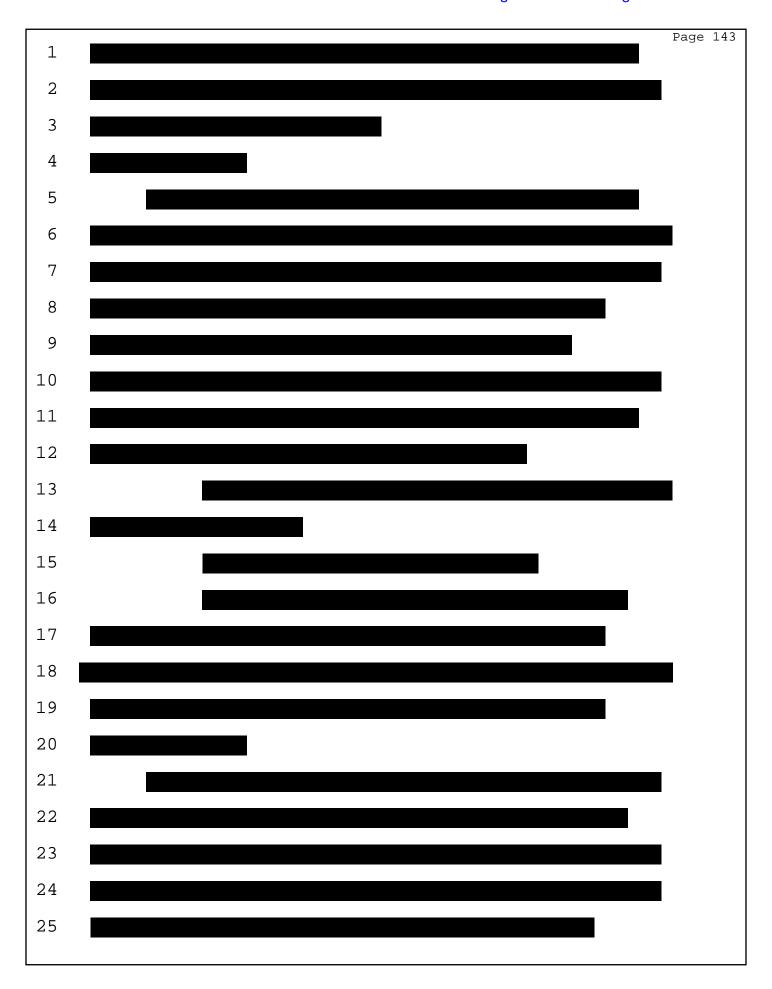


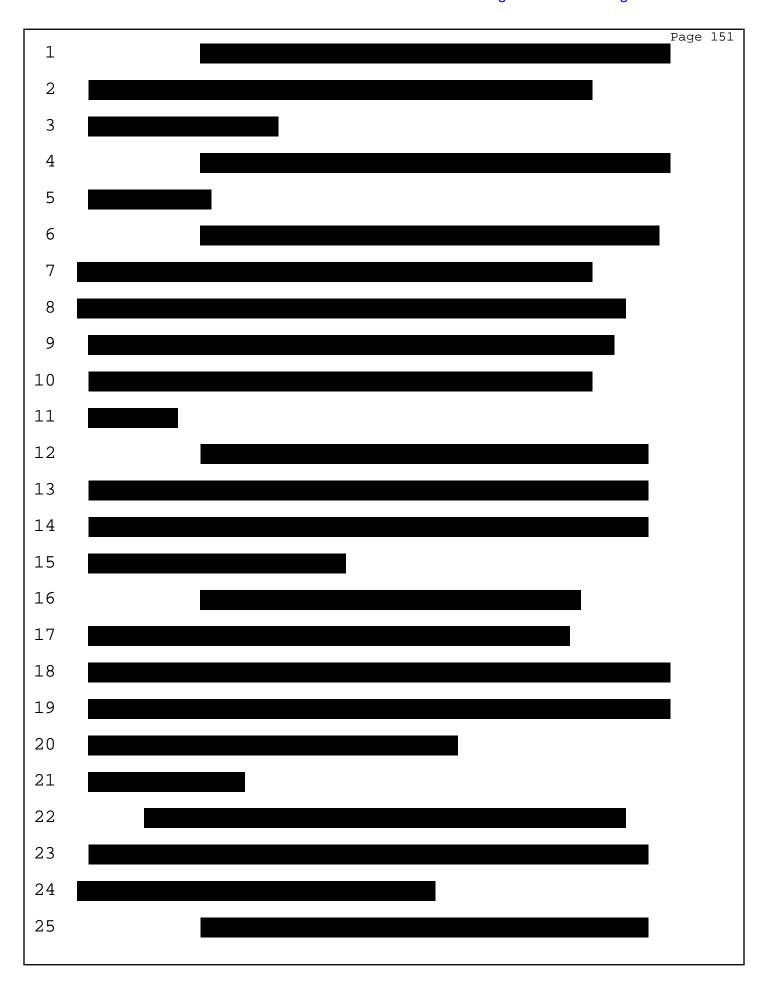


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                    IN THE UNITED STATES DISTRICT COURT
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                       FOR THE DISTRICT OF DELAWARE
 3
     THOMSON REUTERS ENTERPRISE
 4
     CENTRE GMBH and WEST PUBLISHING
 5
     CORPORATION,
 6
       Plaintiffs/Counterdefendants,
                                        ) C.A. No. 20-613-LPS
 7
                 vs.
                                        ) Volume I
 8
     ROSS INTELLIGENCE, INC.,
                                        ) Pages 1 to 343
         Defendant/Counterclaimant.
 9
10
11
12
13
14
           *** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY ***
15
                     PURSUANT TO THE PROTECTIVE ORDER
16
17
            REMOTE VIDEOCONFERENCED VIDEOTAPED DEPOSITION OF
18
                              JONATHAN KREIN
19
                           Salt Lake City, Utah
20
                        Saturday, October 22, 2022
21
22
23
24
     Reported by:
     ELIZABETH BORRELLI, CSR No. 7844, CCRR, CLR
25
     JOB NO. 218478
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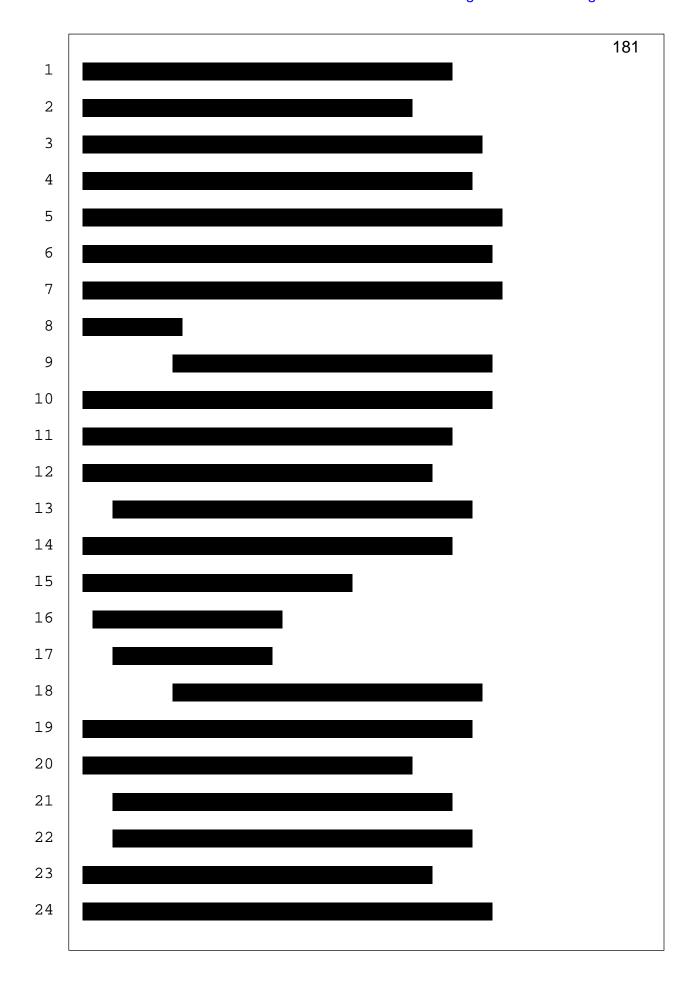


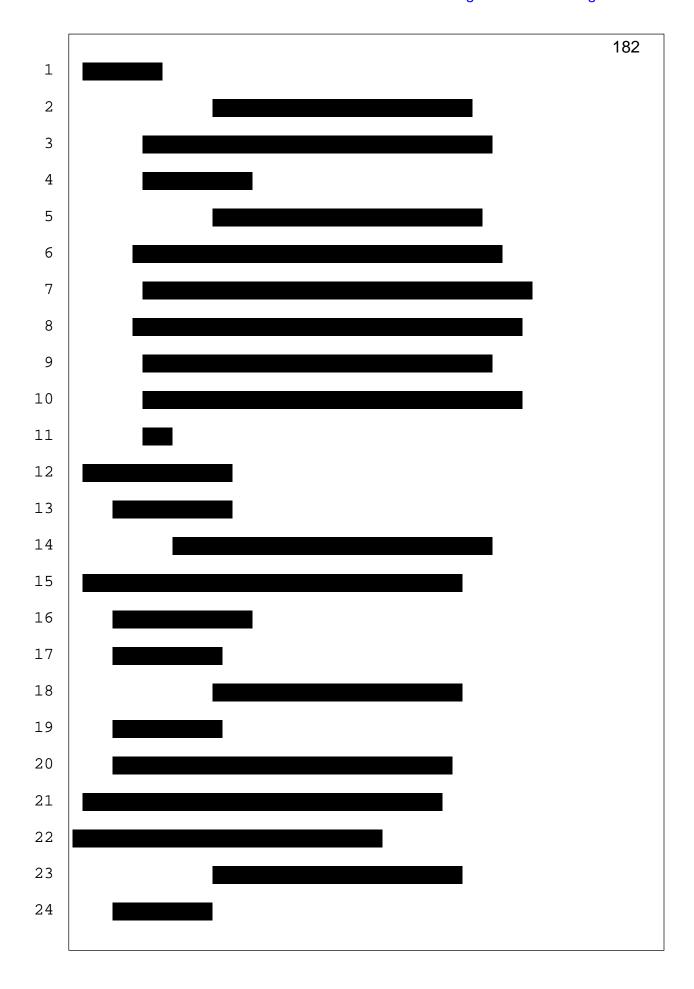


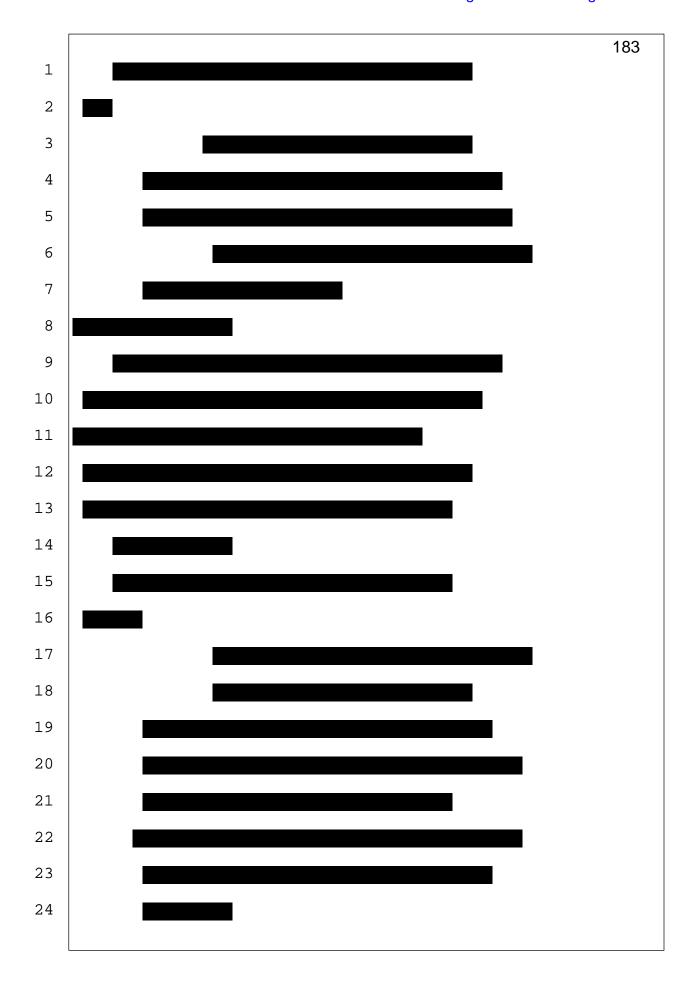


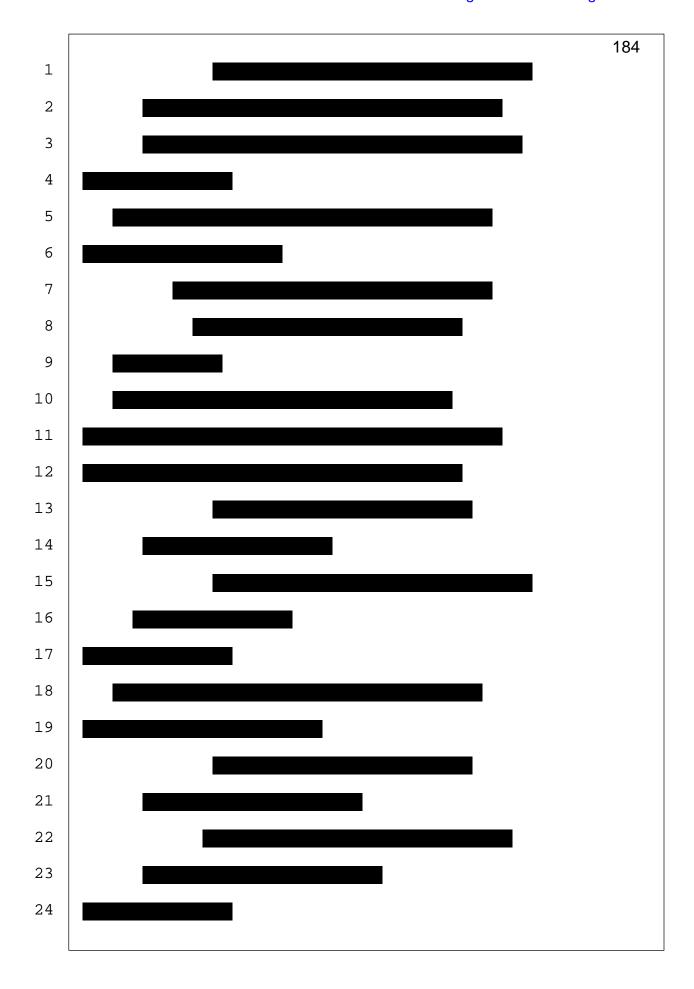


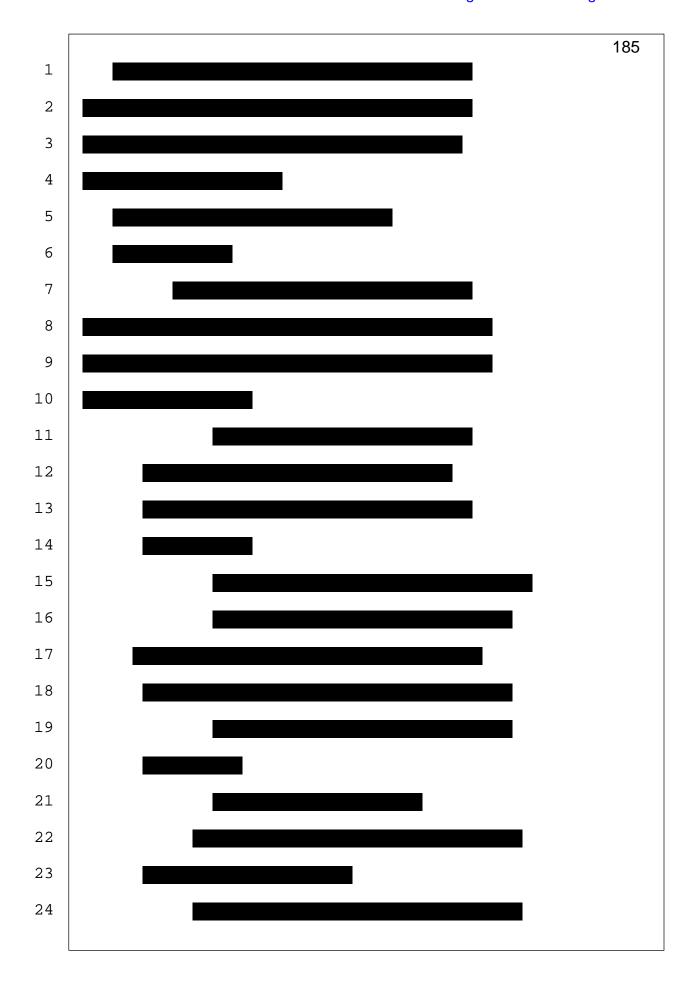
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1	IN THE UNITED STATES DISTRICT COURT	'
2	FOR THE DISTRICT OF DELAWARE	
3	C.A. No. 20-613(LPS)	
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6	IN RE MATTER OF:	
7	THOMSON REUTERS ENTERPRISE	
8	CENTRE GMBH and WEST PUBLISHING	
9	CORPORATION,	
10	Plaintiffs and Counterdefendants	
11	-vs-	
12	ROSS INTELLIGENCE INC.,	
13	Defendant and Counterclaimant.	
14		
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17		
18	HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY	
19	REMOTE TESTIMONY OF RICHARD A. LEITER	
20	October 24, 2022 - 11 A.M. CDT	
21		
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23		
24	JOB NO. 2022-866213	

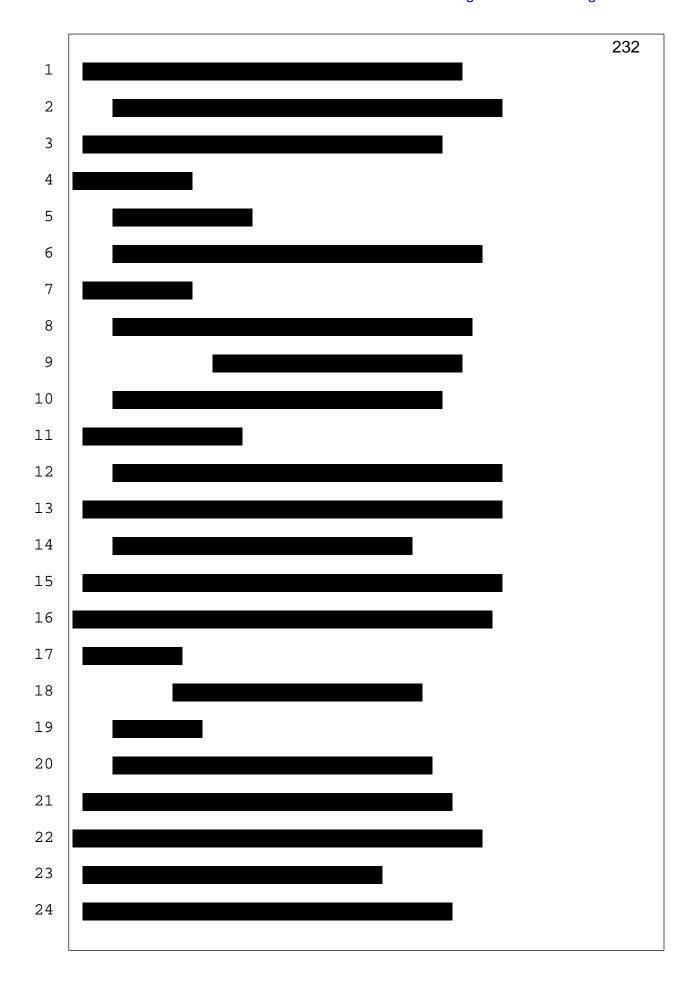






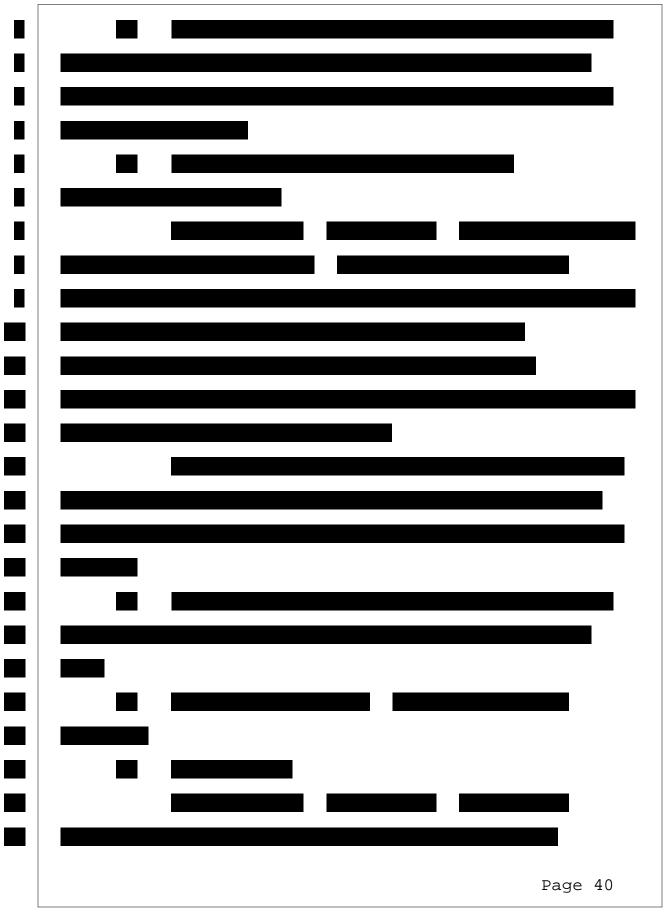


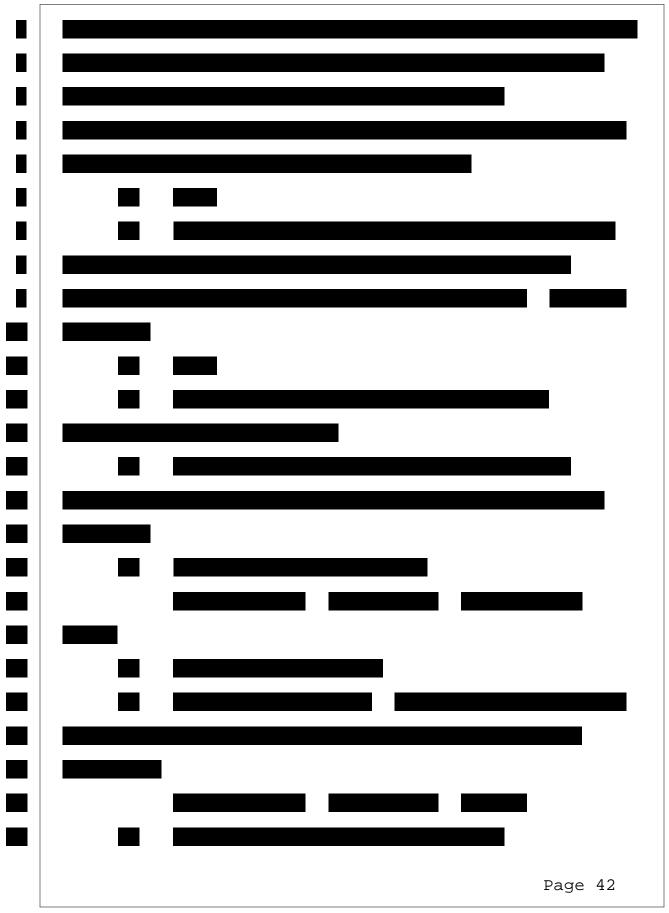


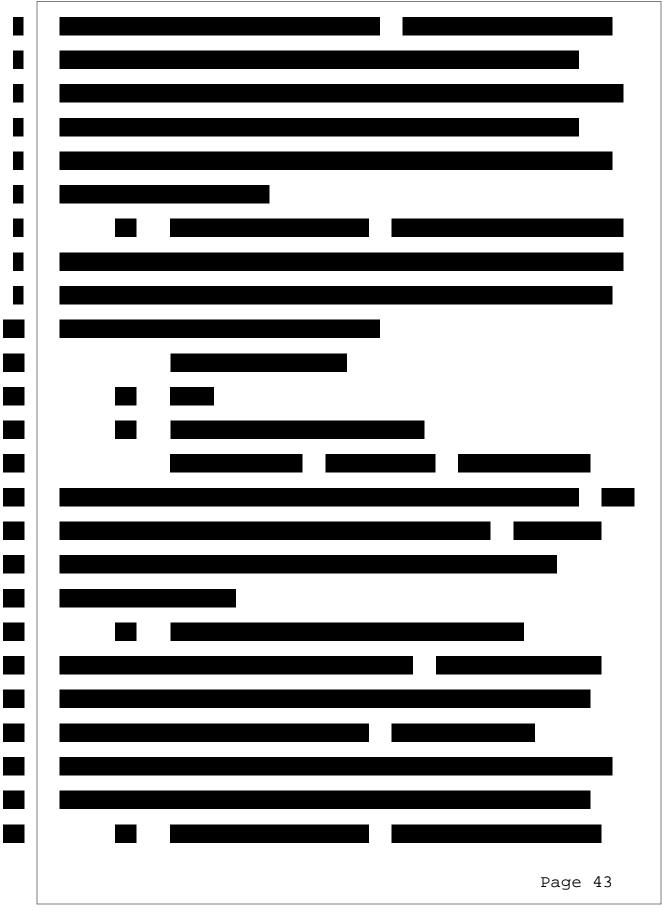


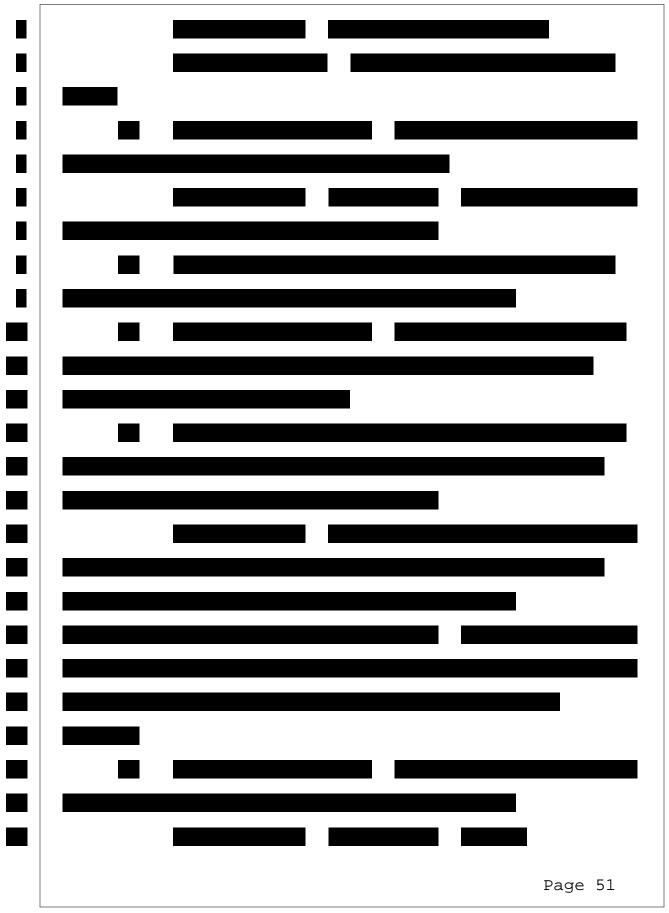
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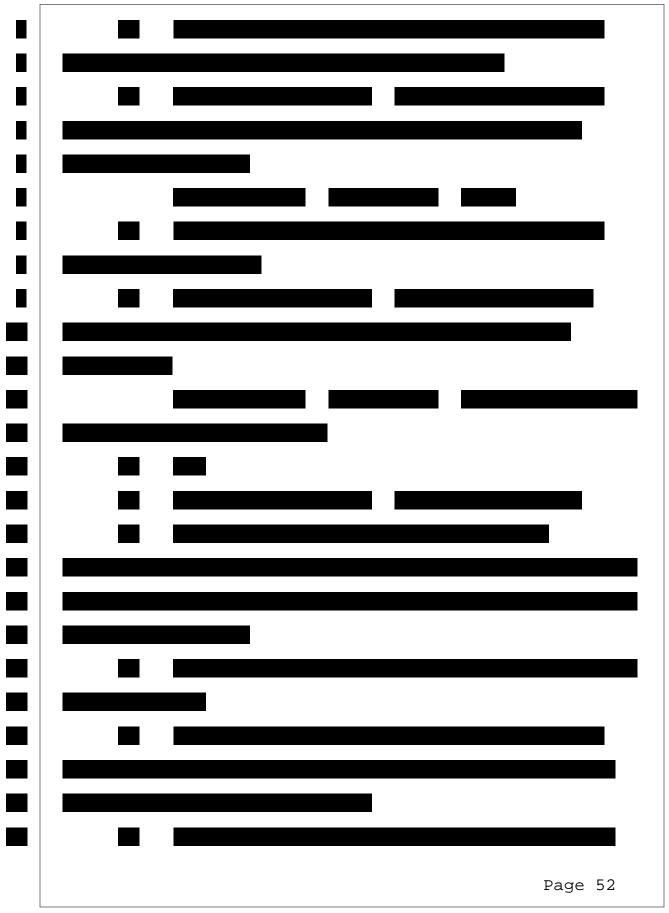
1	UNITED STATES DISTRICT COURT
2	FOR THE DISTRICT OF DELAWARE
3	
4	THOMSON REUTERS ENTERPRISE
5	CENTRE GMBH and WEST PUBLISHING
6	CORPORATION,
7	Plaintiffs/Counterdefendants,
8	vs. Case No.
9	ROSS INTELLIGENCE INC., C.A. No. 20-613-LPS
10	Defendant/Counterclaimant.
11	
12	** HIGHLY CONFIDENTIAL **
13	
14	VIDEOTAPED DEPOSITION OF ERIK LINDBERG
15	Tuesday, March 22, 2022
16	9:00 a.m. (Central)
17	
18	PLACE: Veritext Legal Solutions
19	150 South Fifth Street
20	Suite 1775
21	Minneapolis, Minnesota
22	
23	Reported By:
24	Christine K. Herman, RPR, CRR
25	JOB No. 5129633
	Page 1

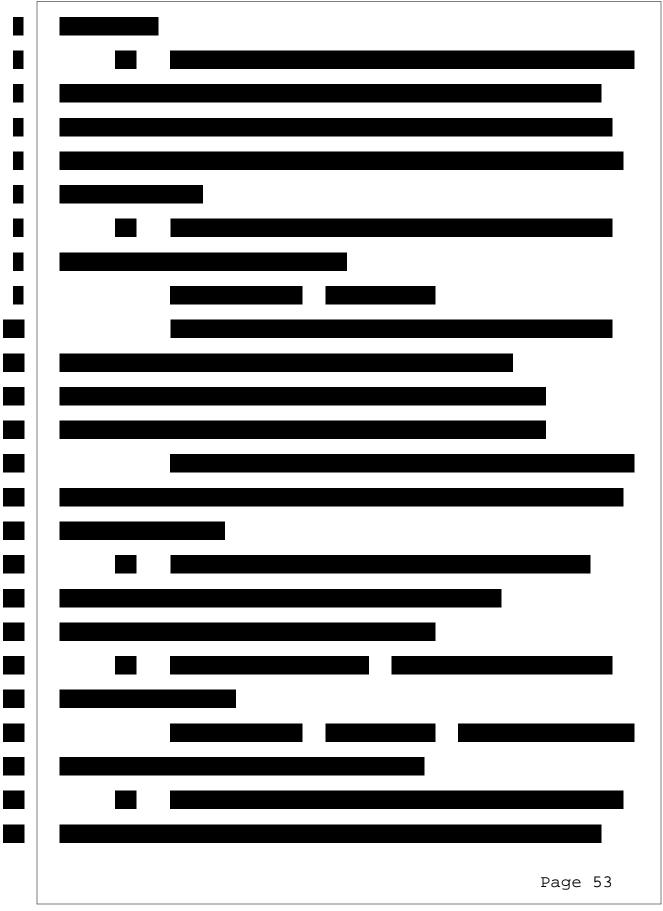


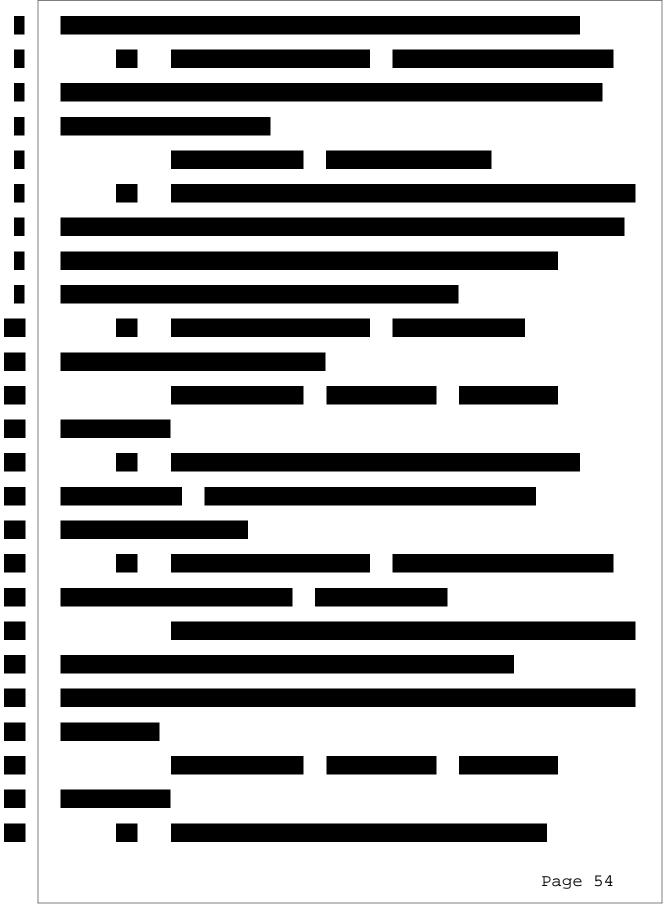


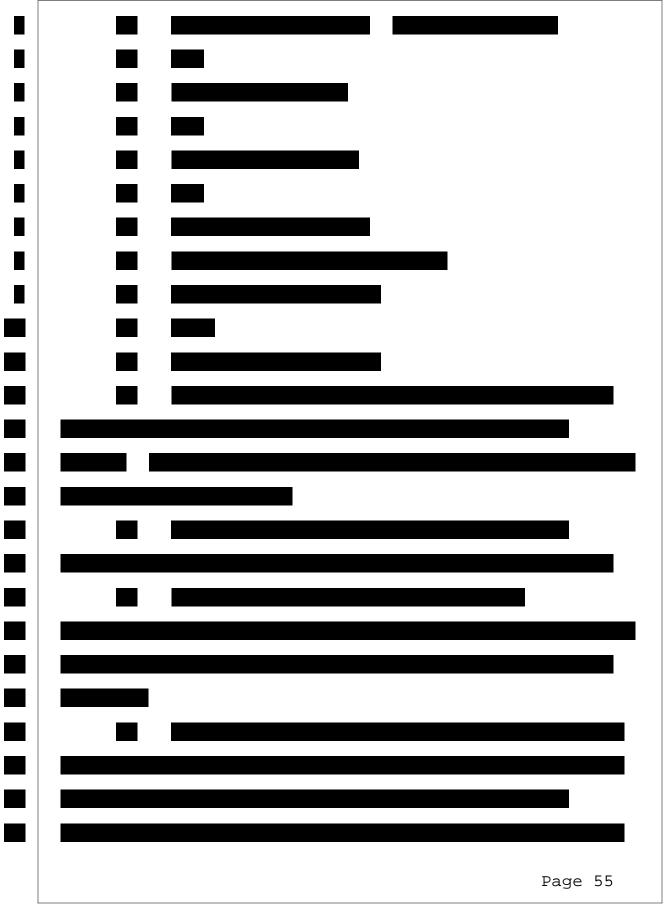


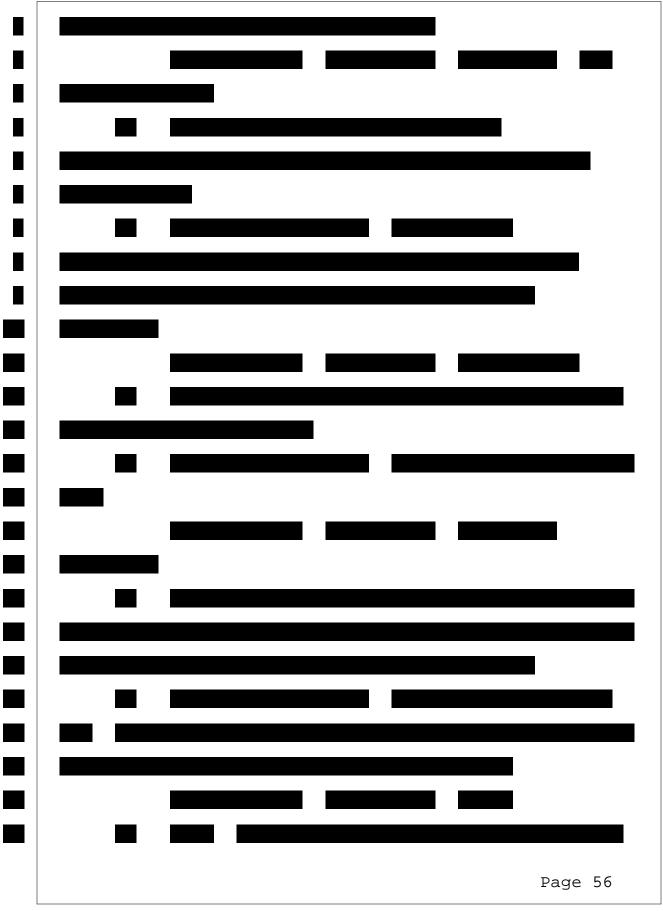


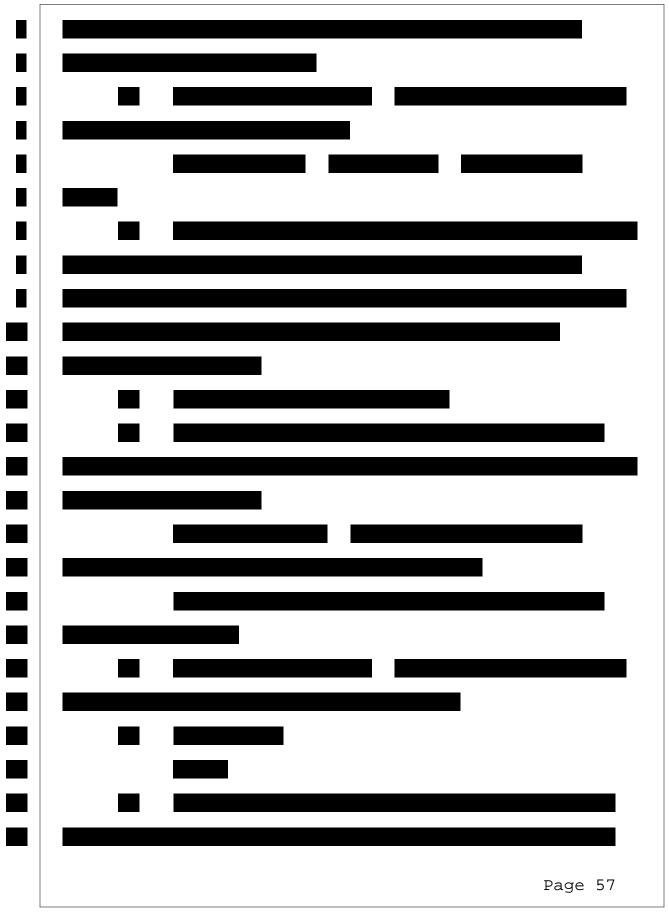


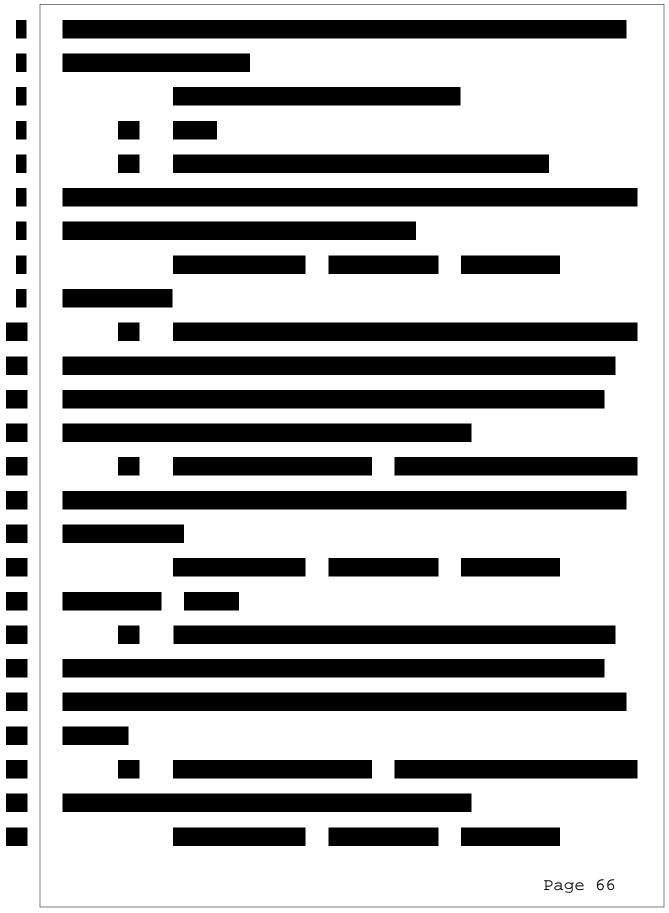


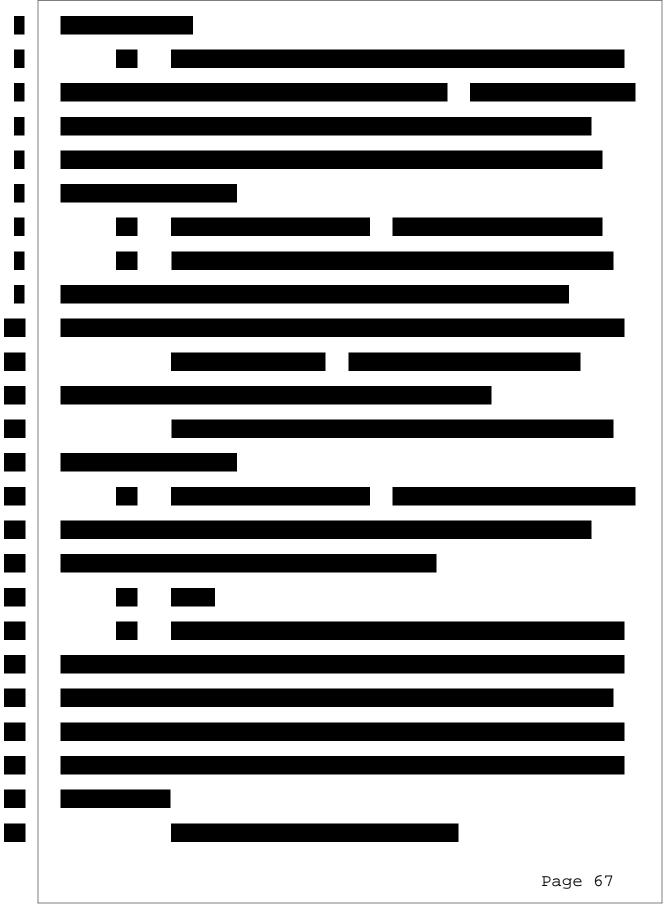


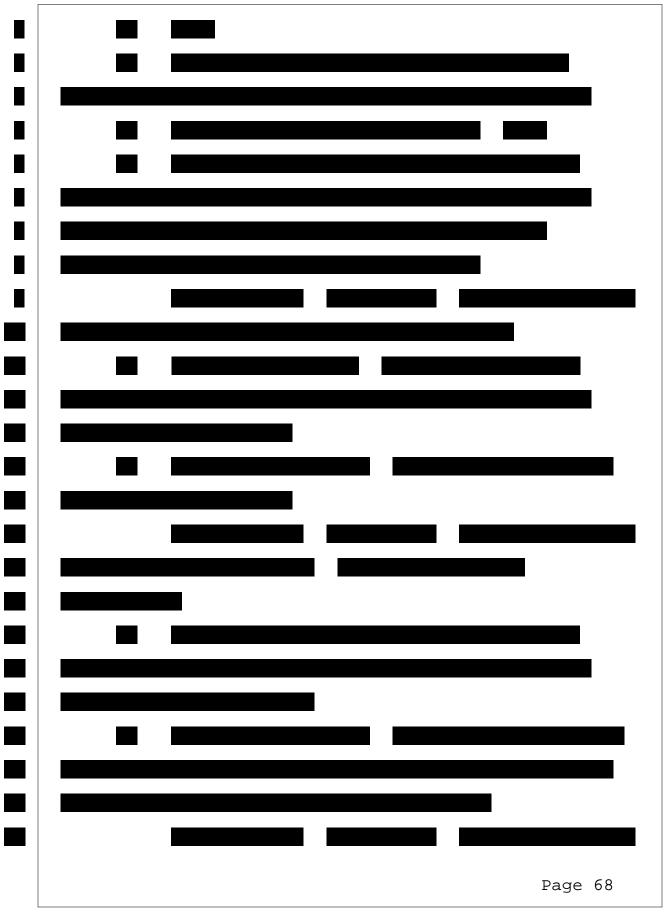


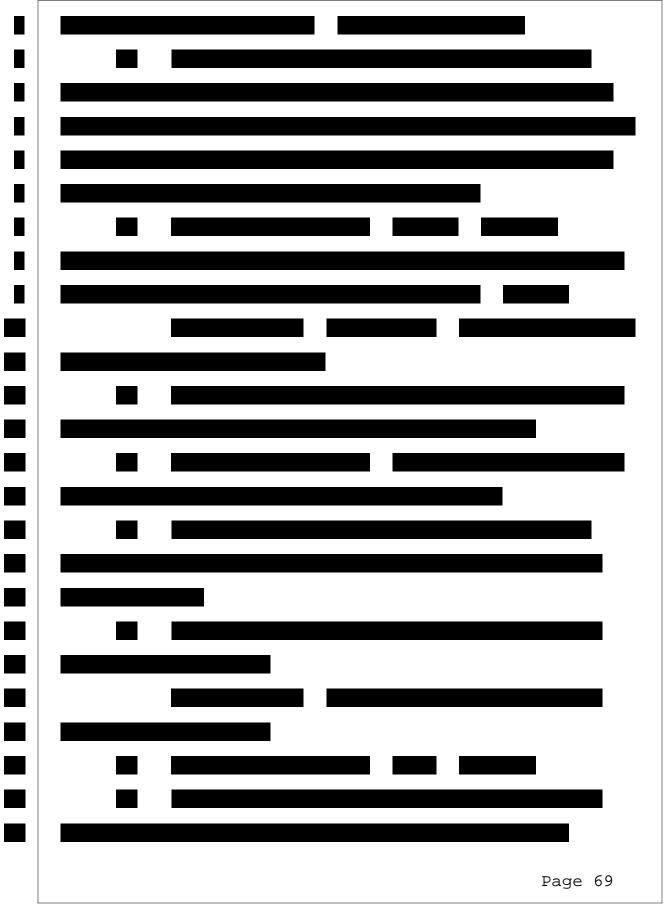


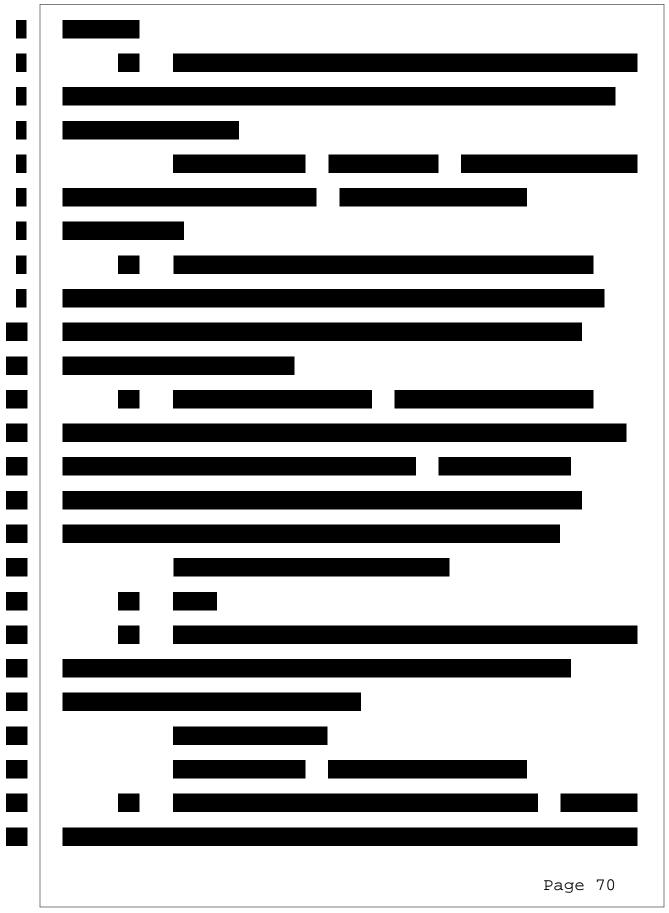


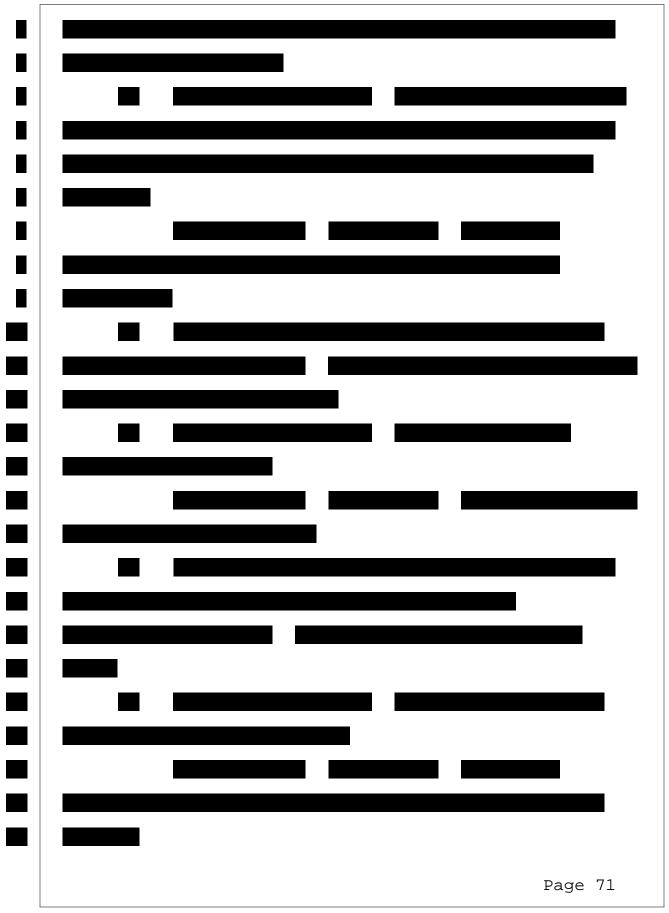


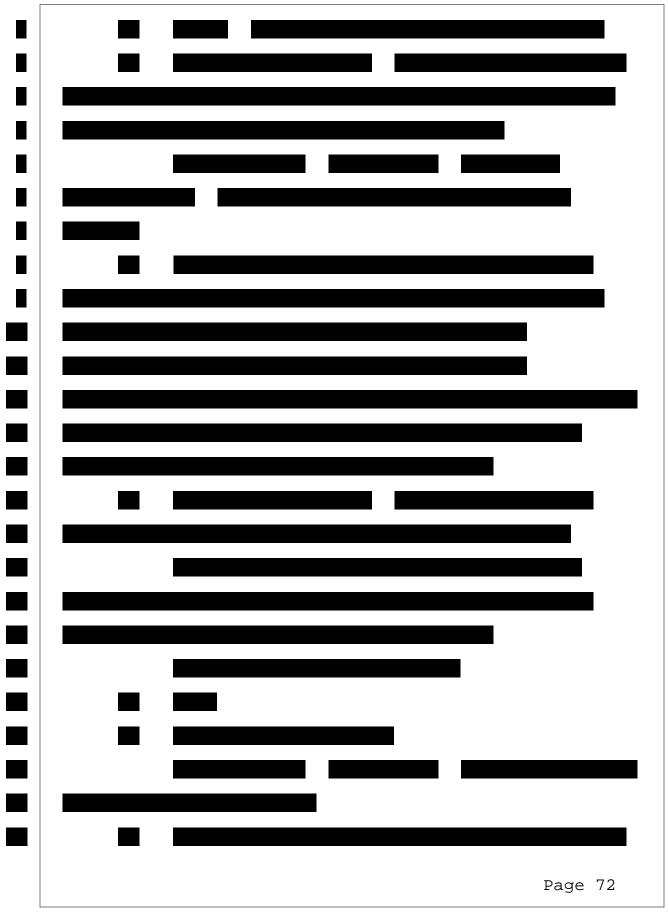


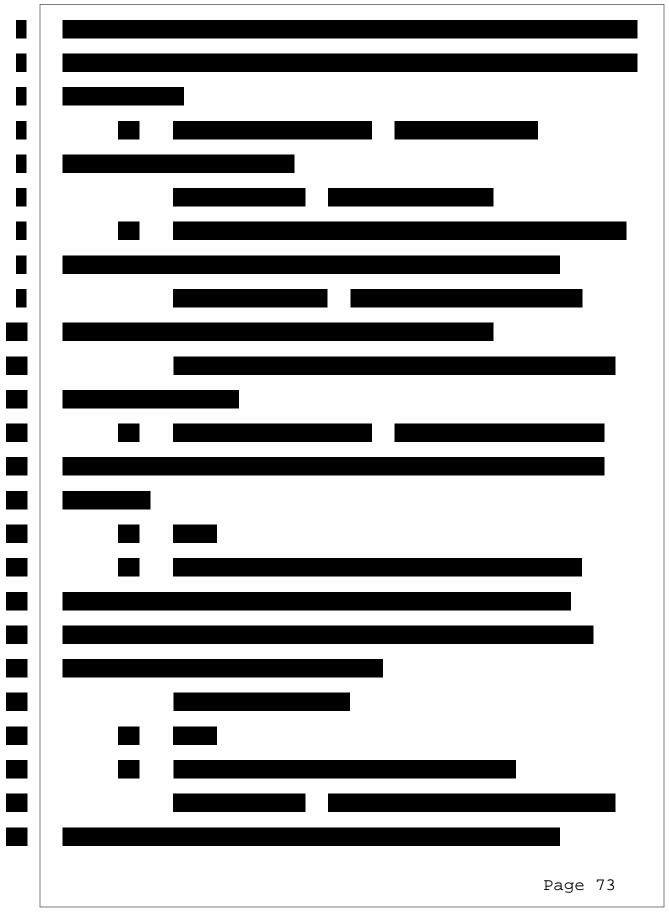












## EXHIBIT 122

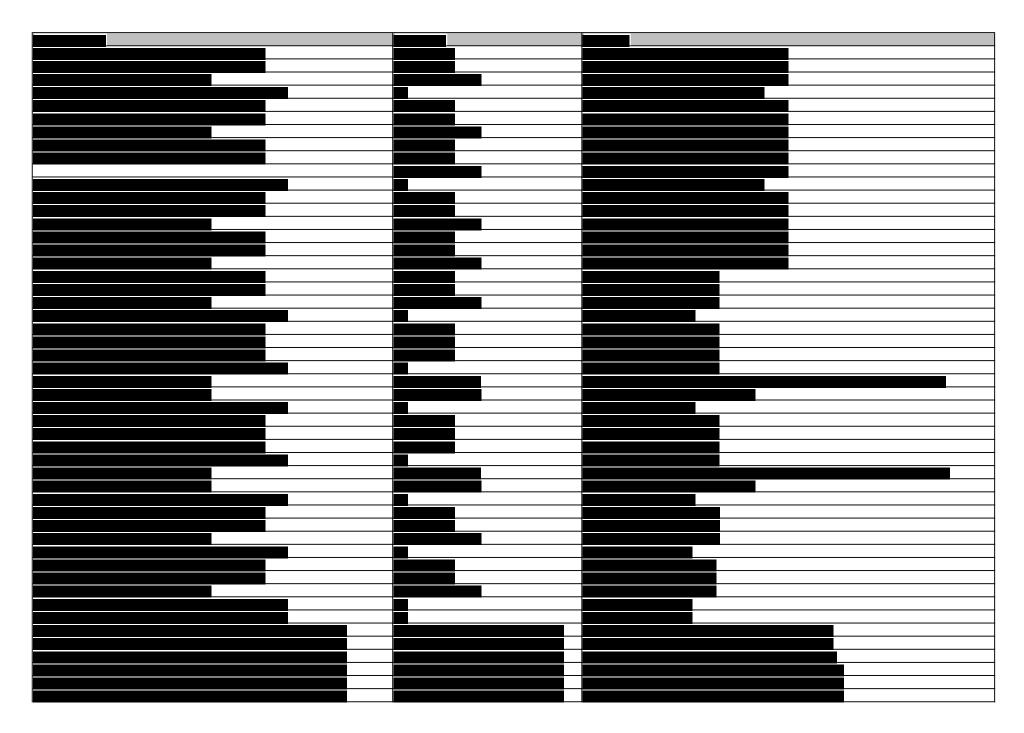
1	IN THE UNITED STATES DISTRICT COURT	Page 1
2	FOR THE DISTRICT OF DELAWARE	
3		
4	THOMSON REUTERS ENTERPRISE	
5	CENTRE GMBH and WEST PUBLISHING	
6	CORPORATION,	
7	Plaintiffs/Counterdefendants,	
8		
9	vs. C.A. No. 20-613-LPS	
10		
11	ROSS INTELLIGENCE, INC.,	
12	Defendant/Counterclaimant.	
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15	HIGHLY CONFIDENTIAL	
16	PURSUANT TO PROTECTIVE ORDER	
17		
18	VIDEOTAPED AND VIDEOCONFERENCE	
19	DEPOSITION OF TERI WHITEHEAD	
20		
21	Monday, April 18, 2022	
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23	Reported by:	
24	Denise M. Kizy, RPR, CRR, CSR-2466	
25	JOB NO. 208941	

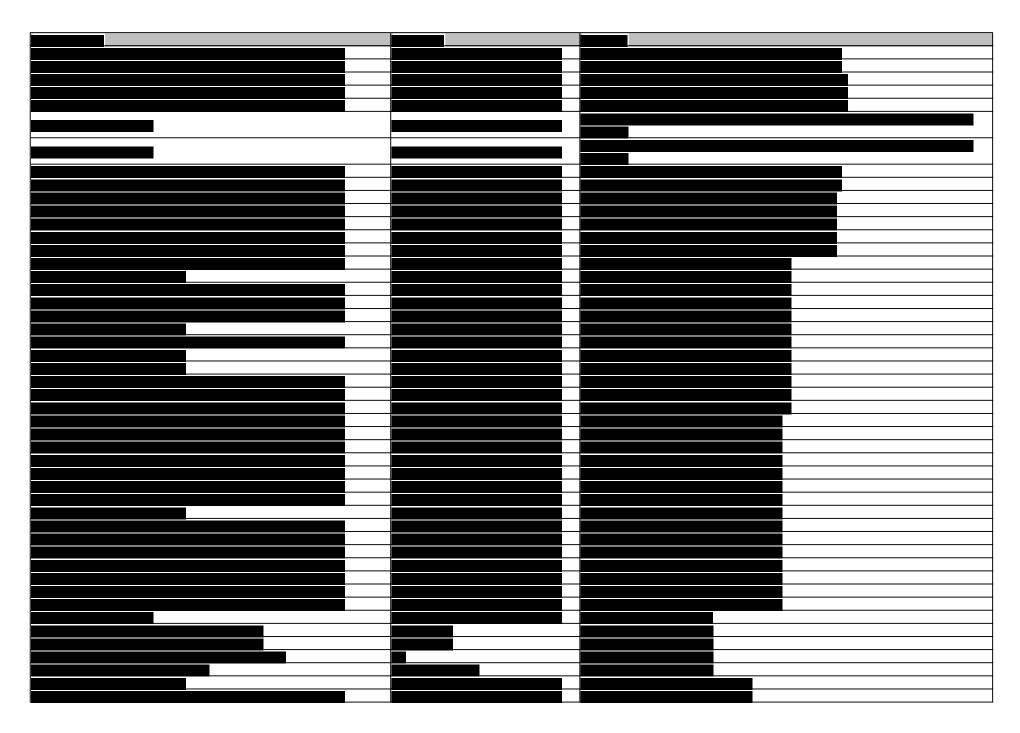
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## EXHIBIT 123

## **APPENDIX B**





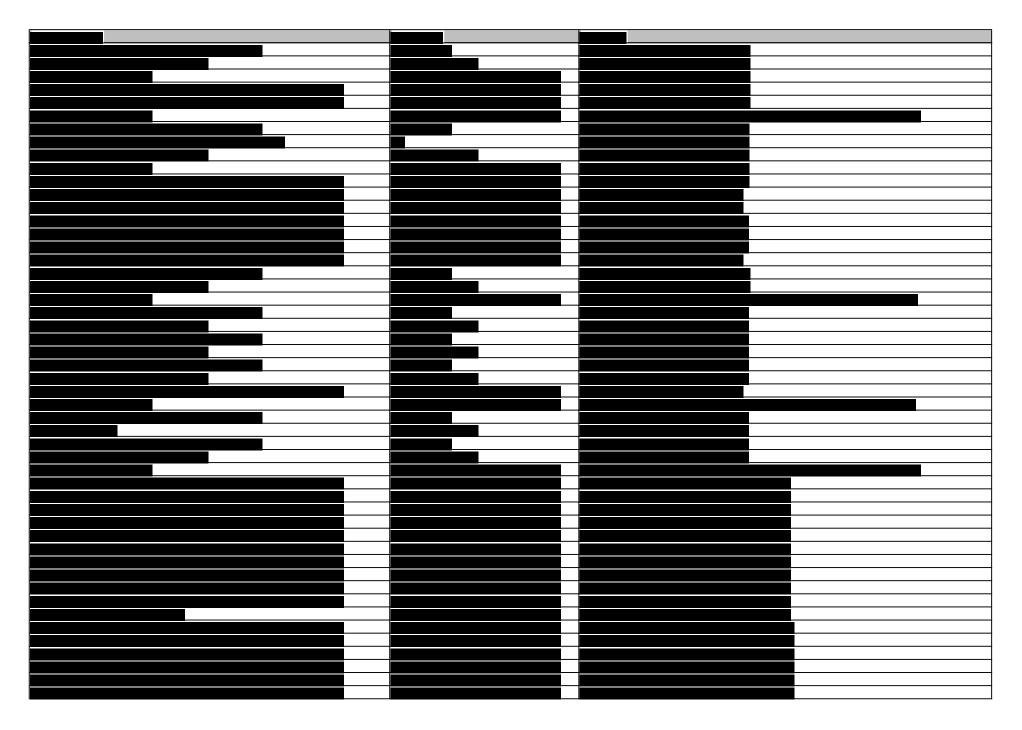
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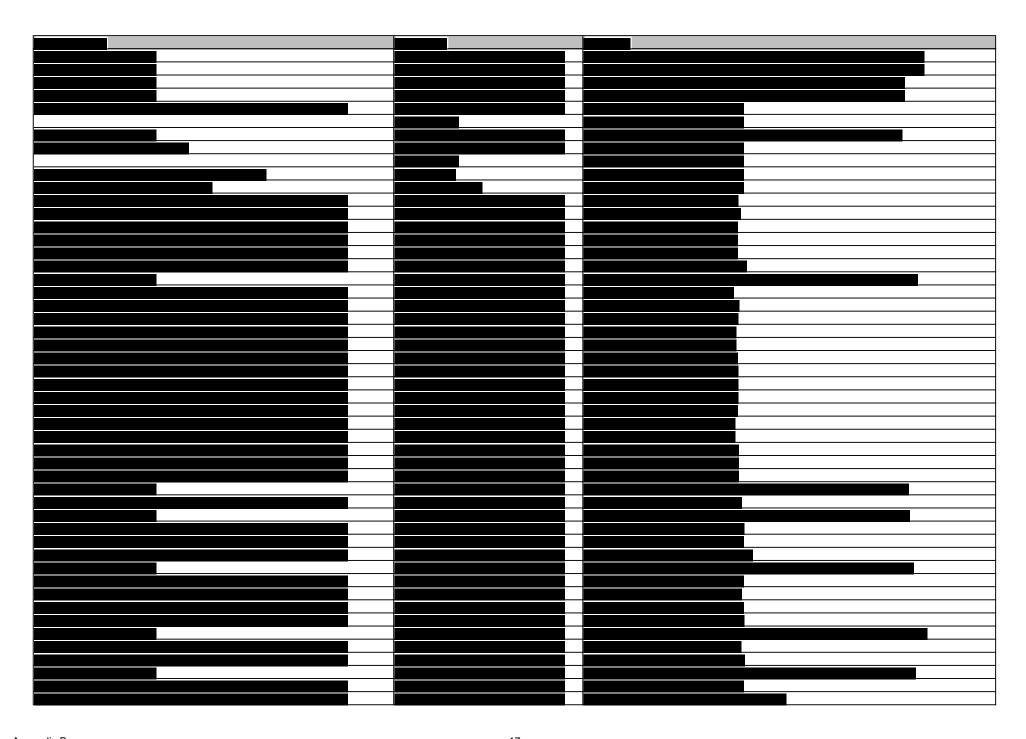
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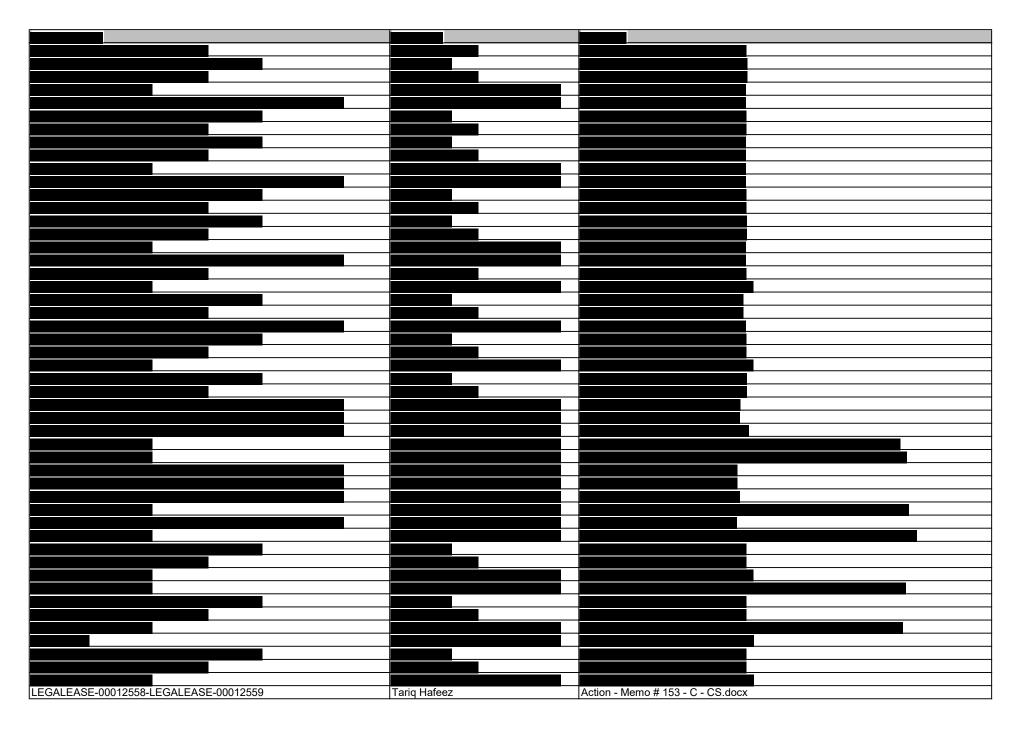

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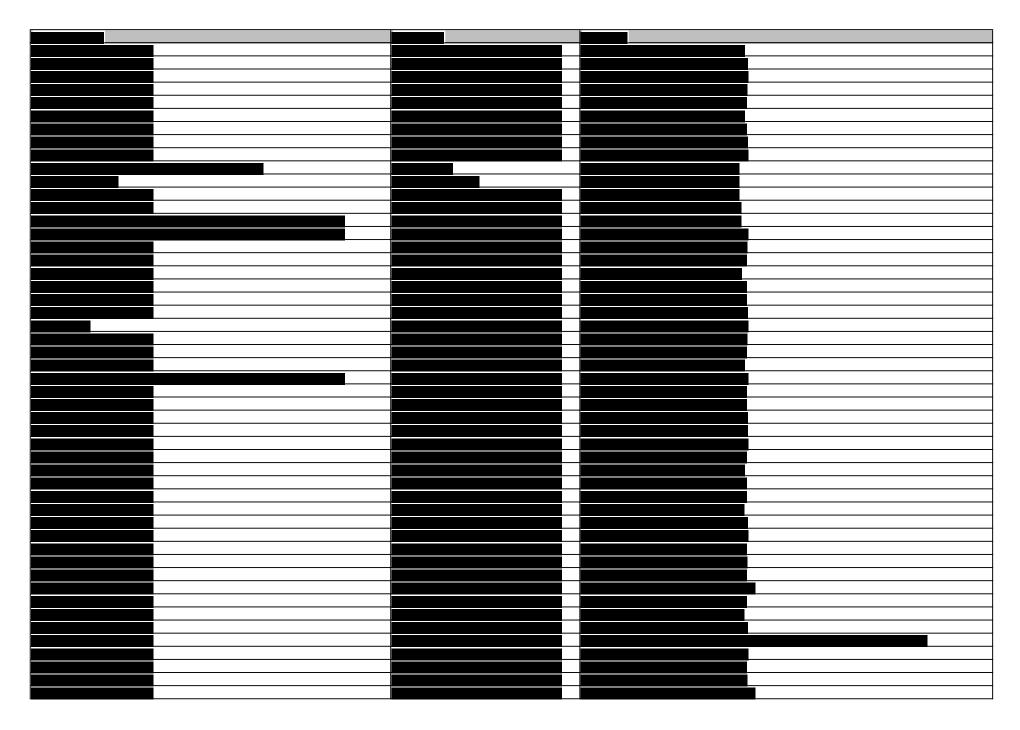














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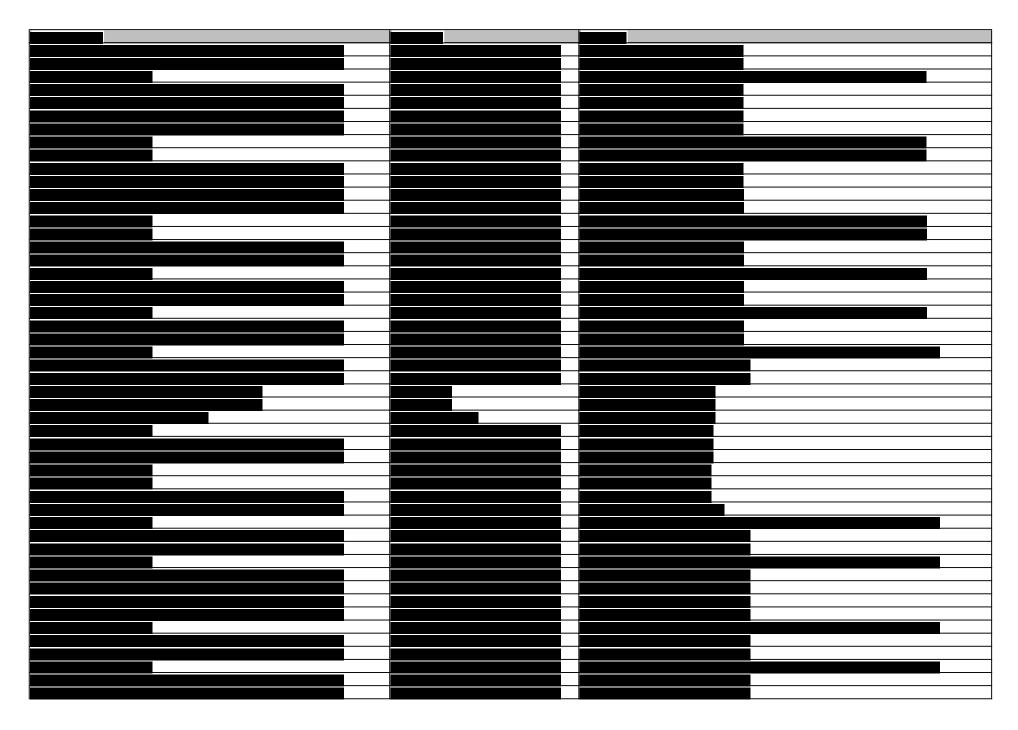

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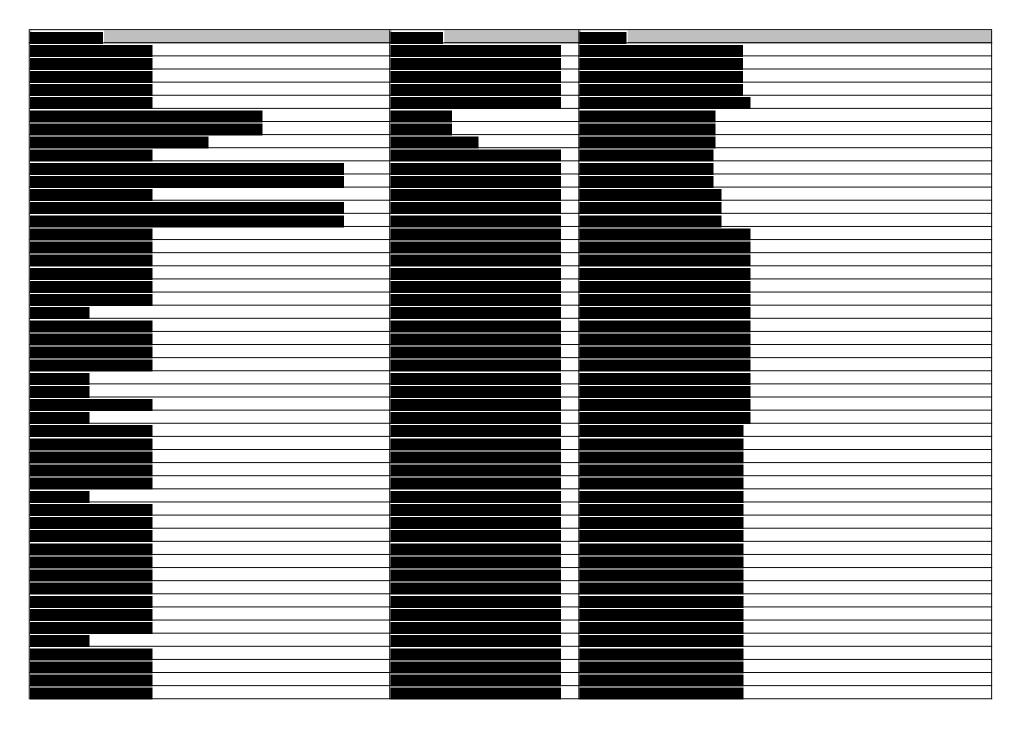


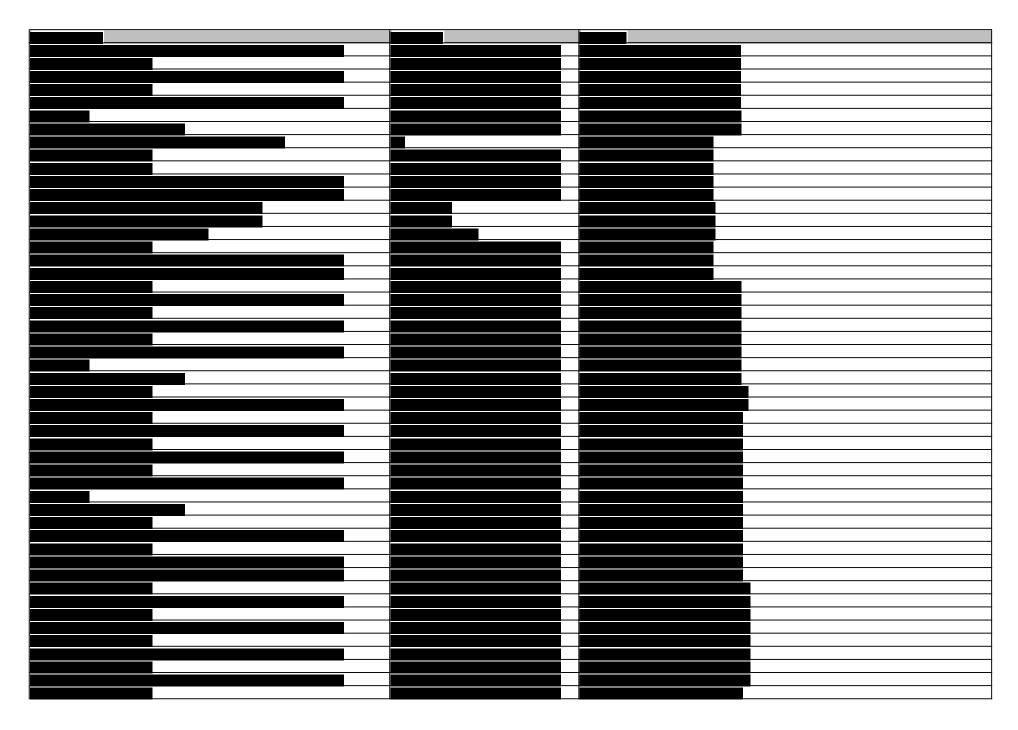
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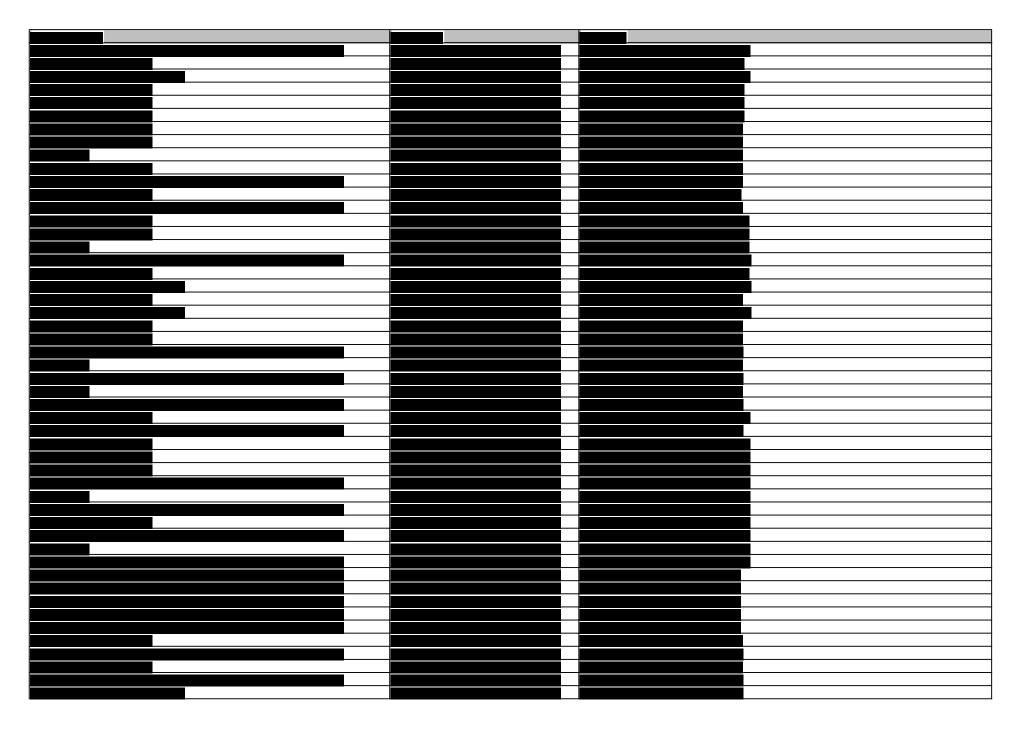

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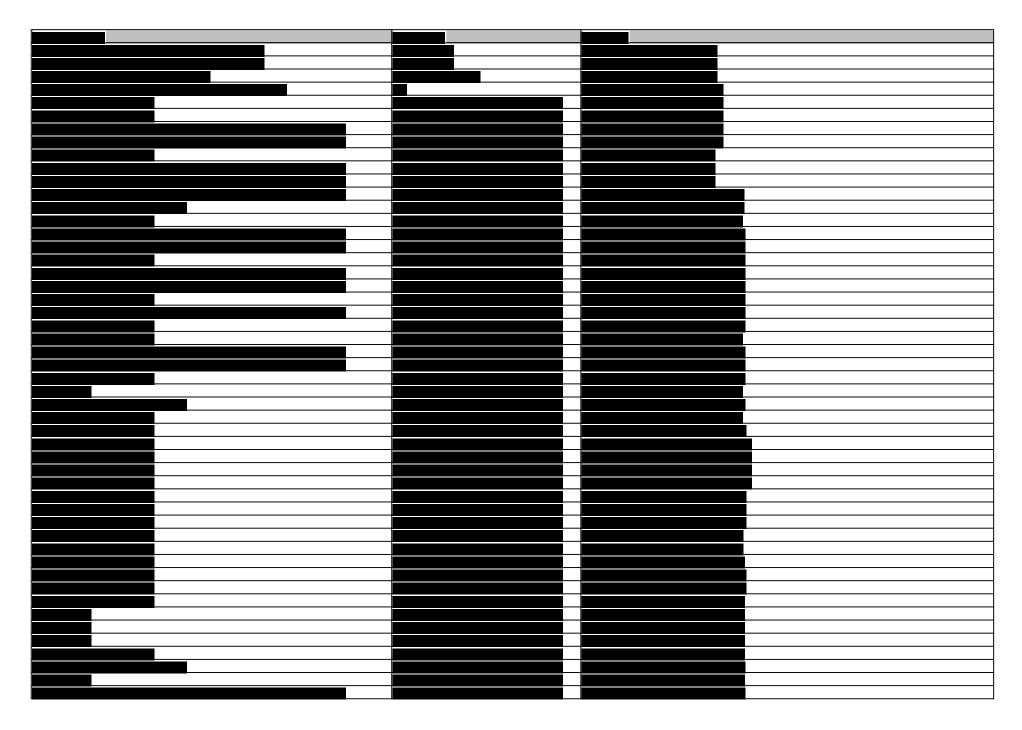


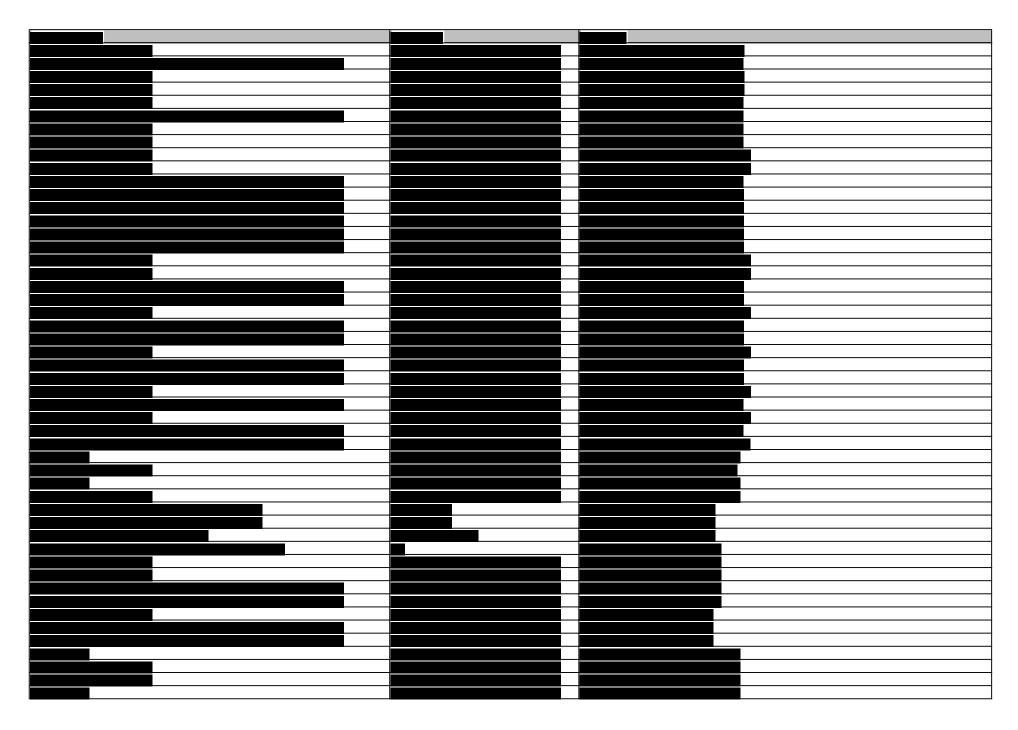

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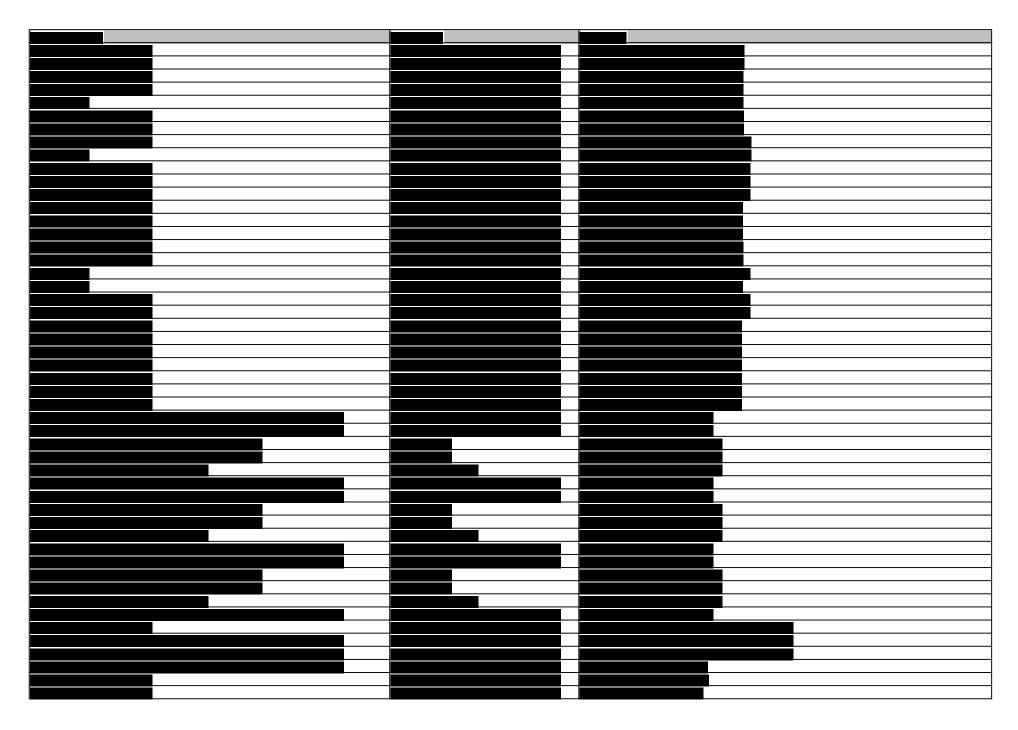
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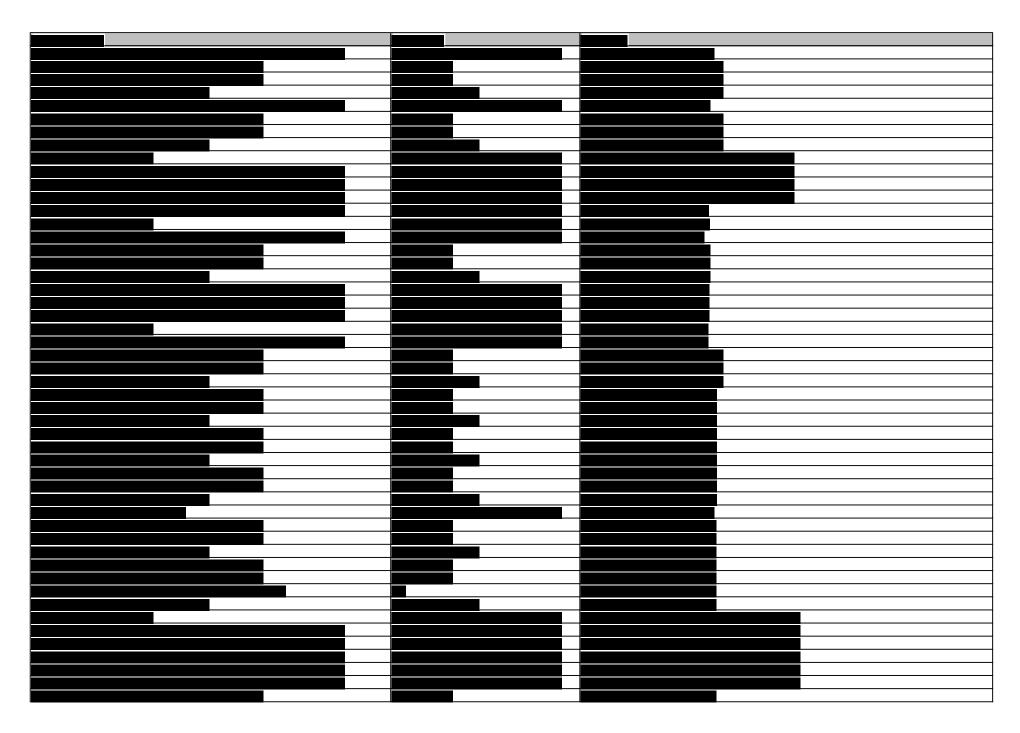


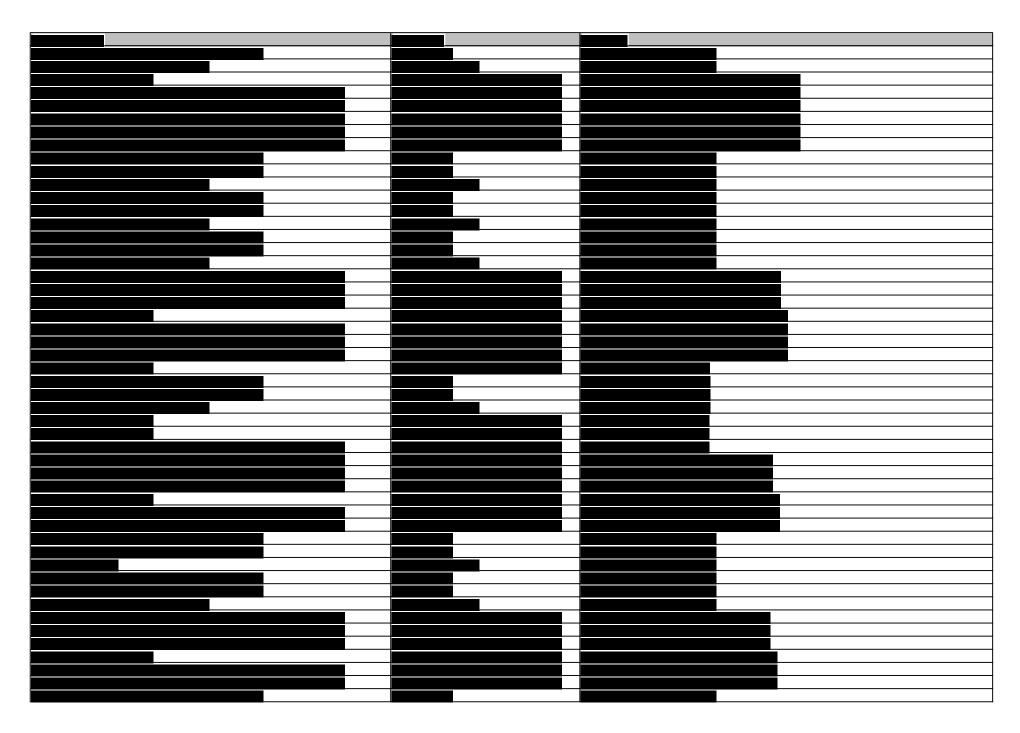
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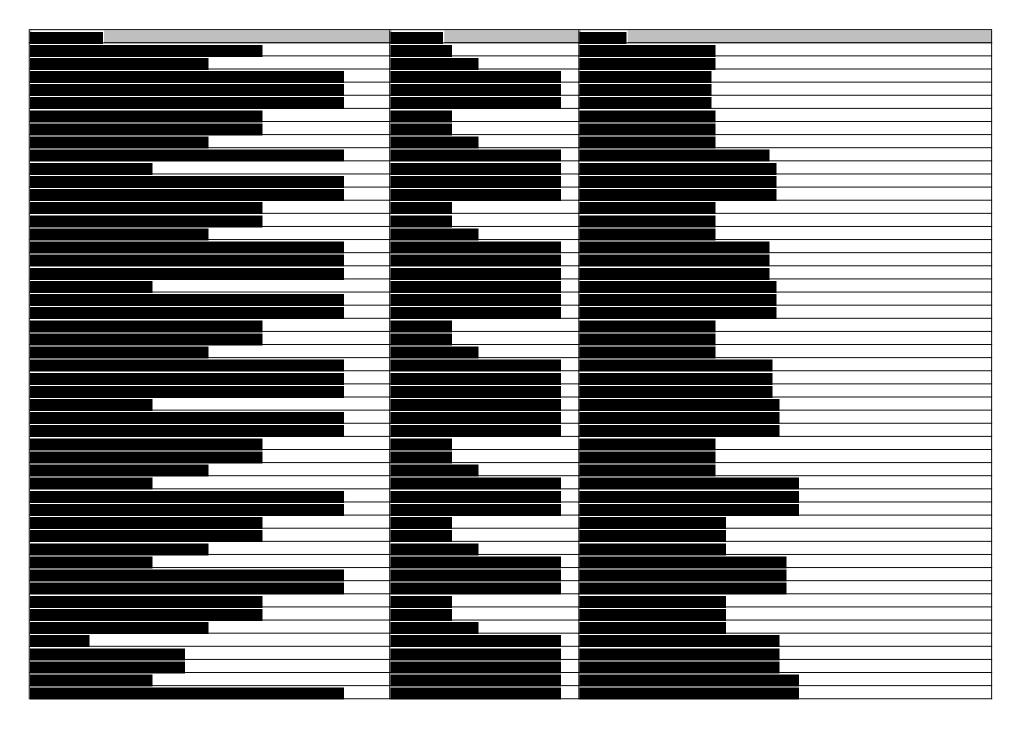
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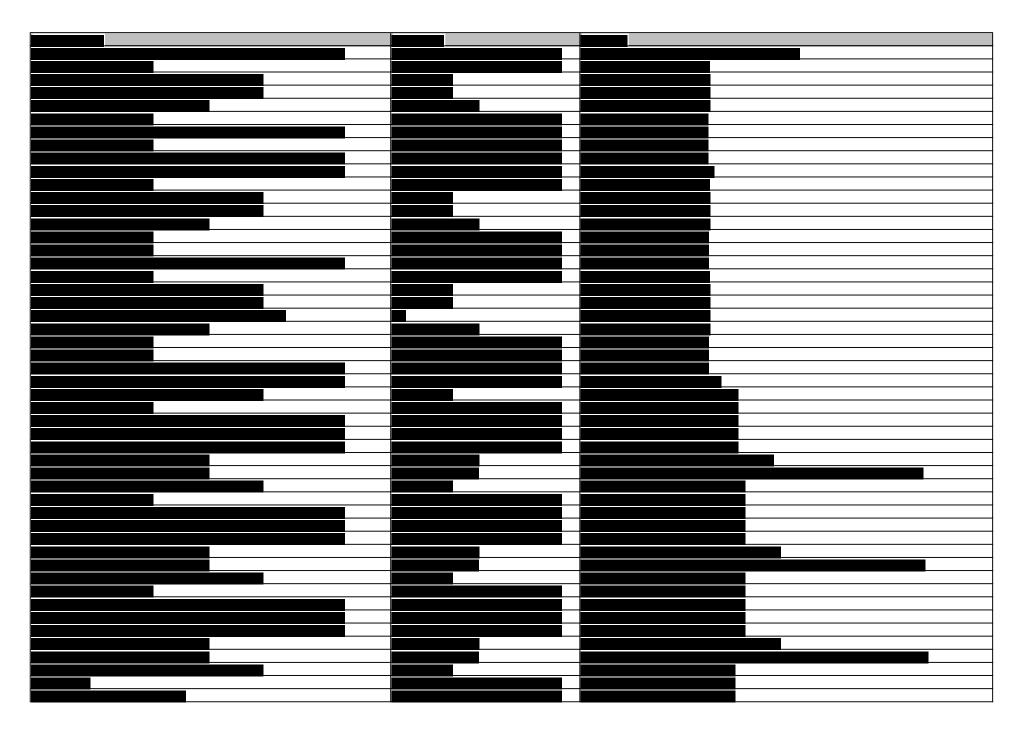






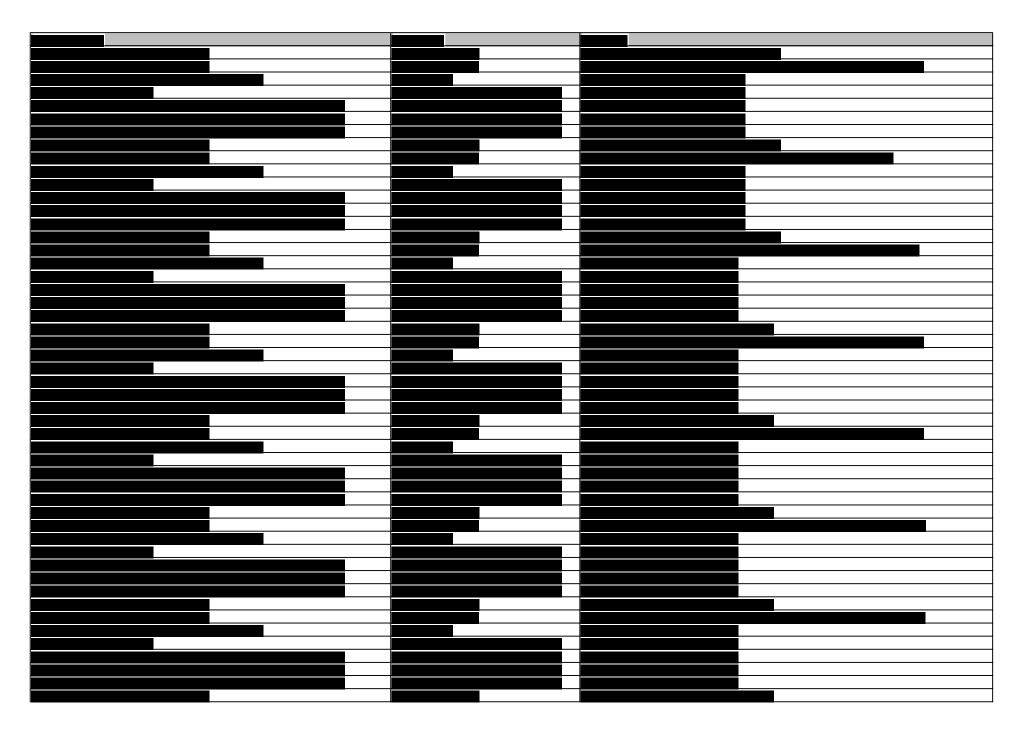


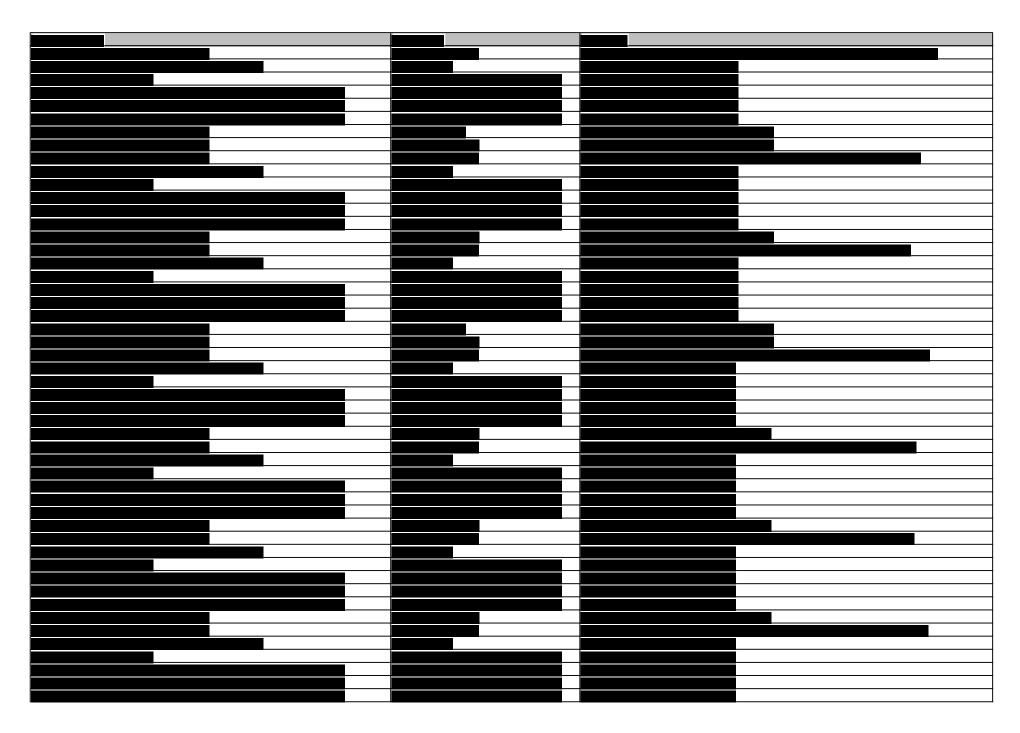


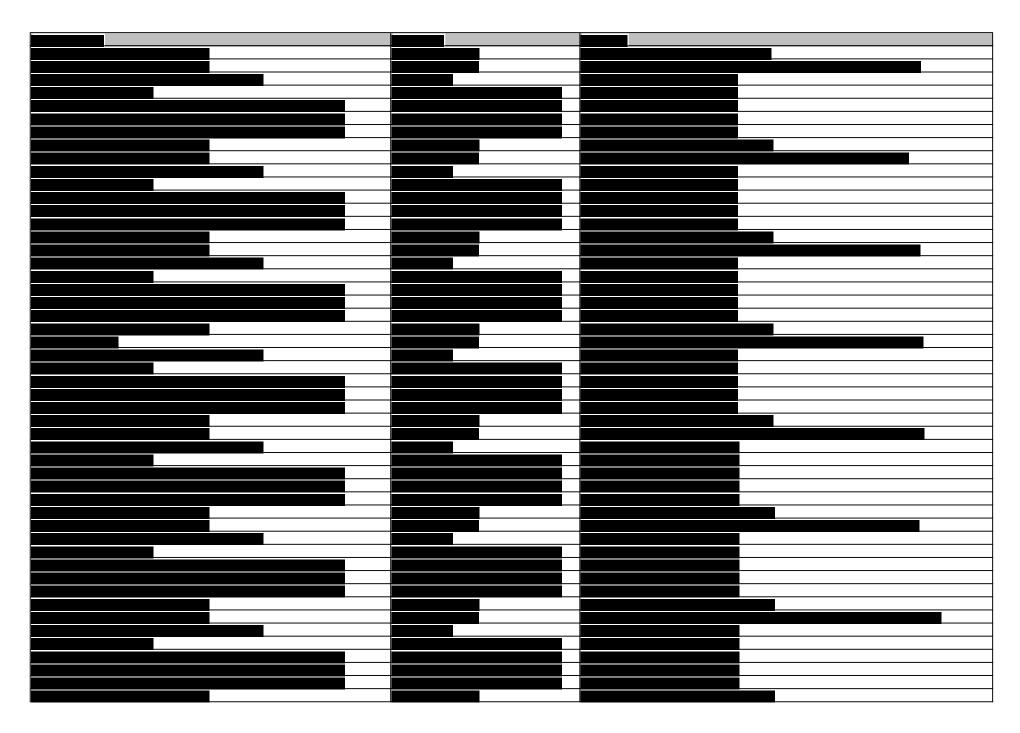












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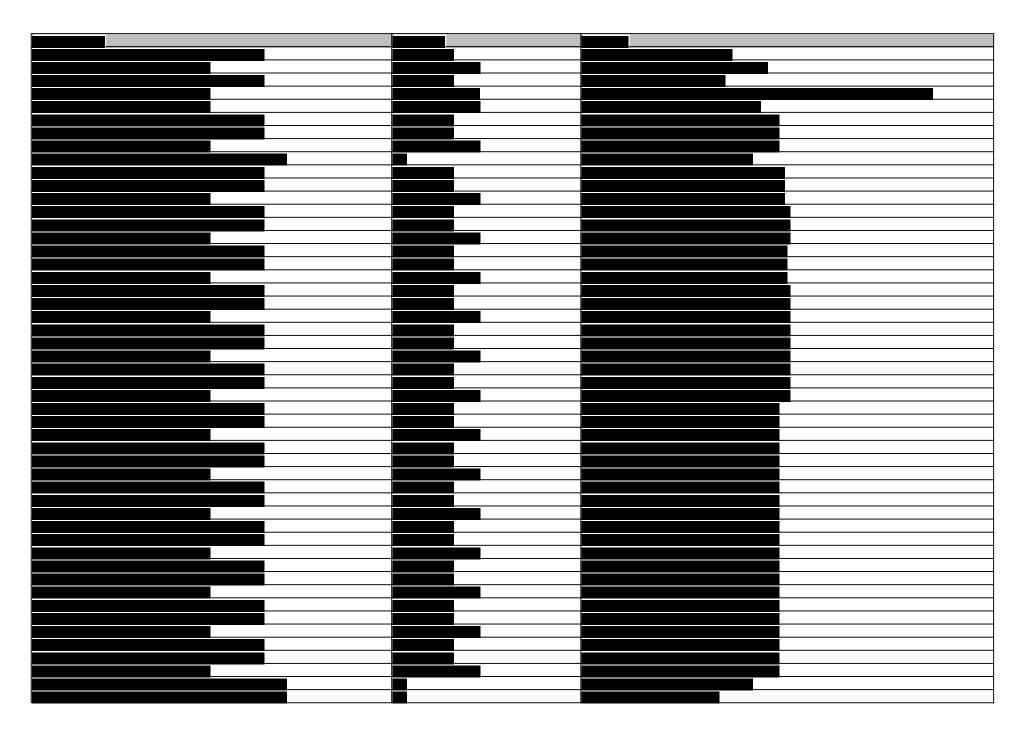
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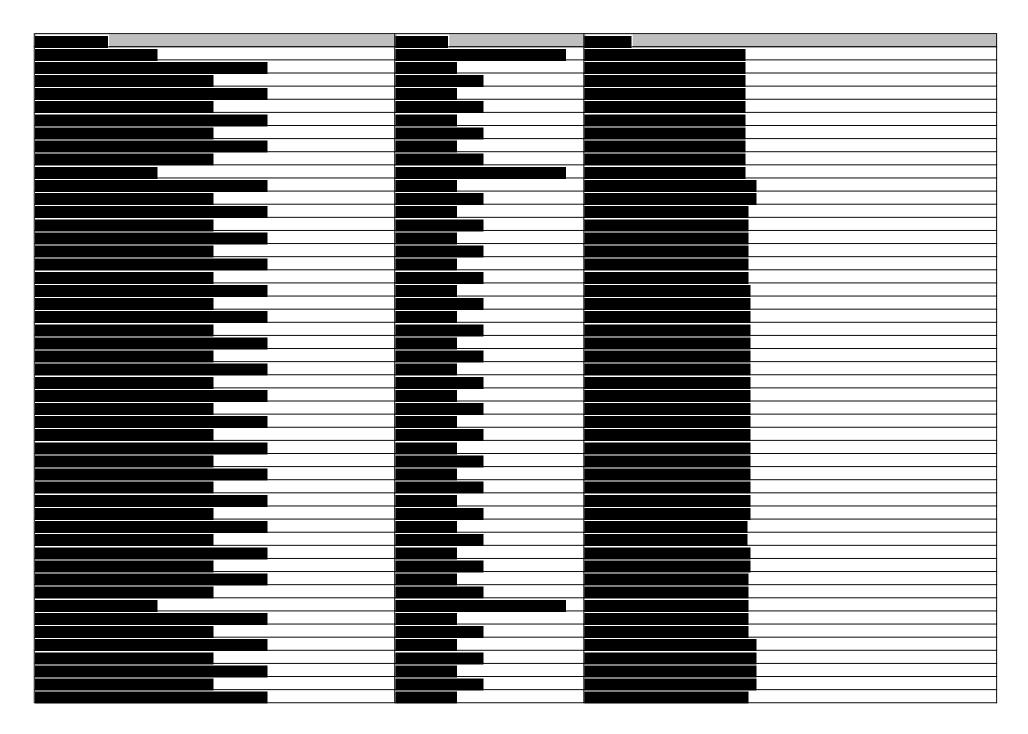


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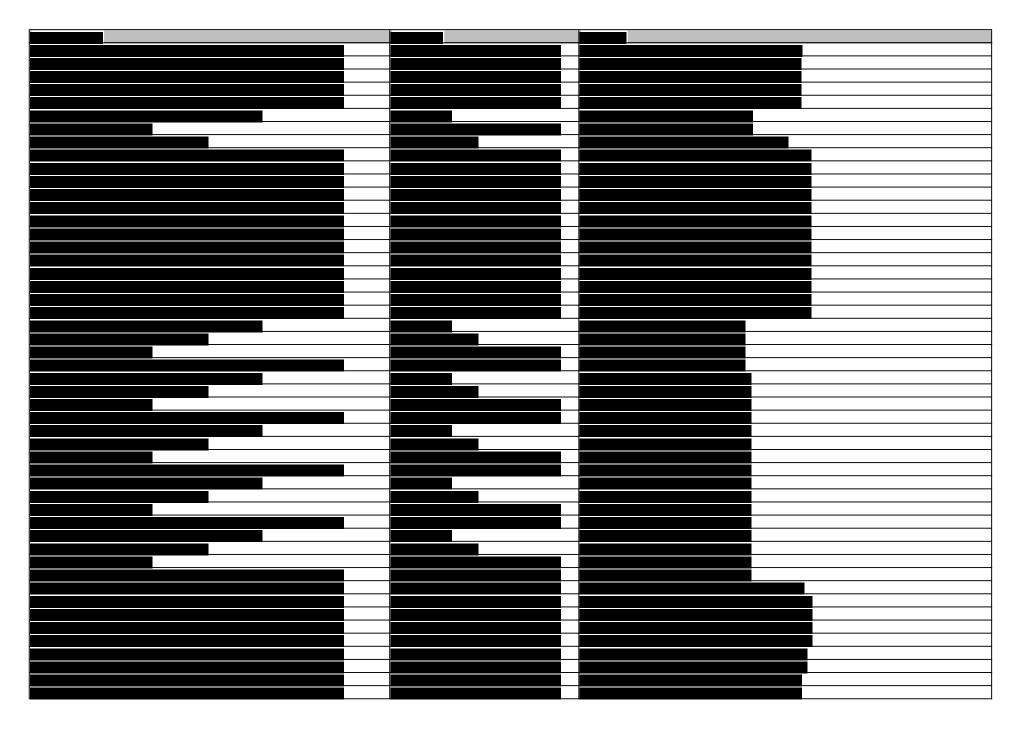
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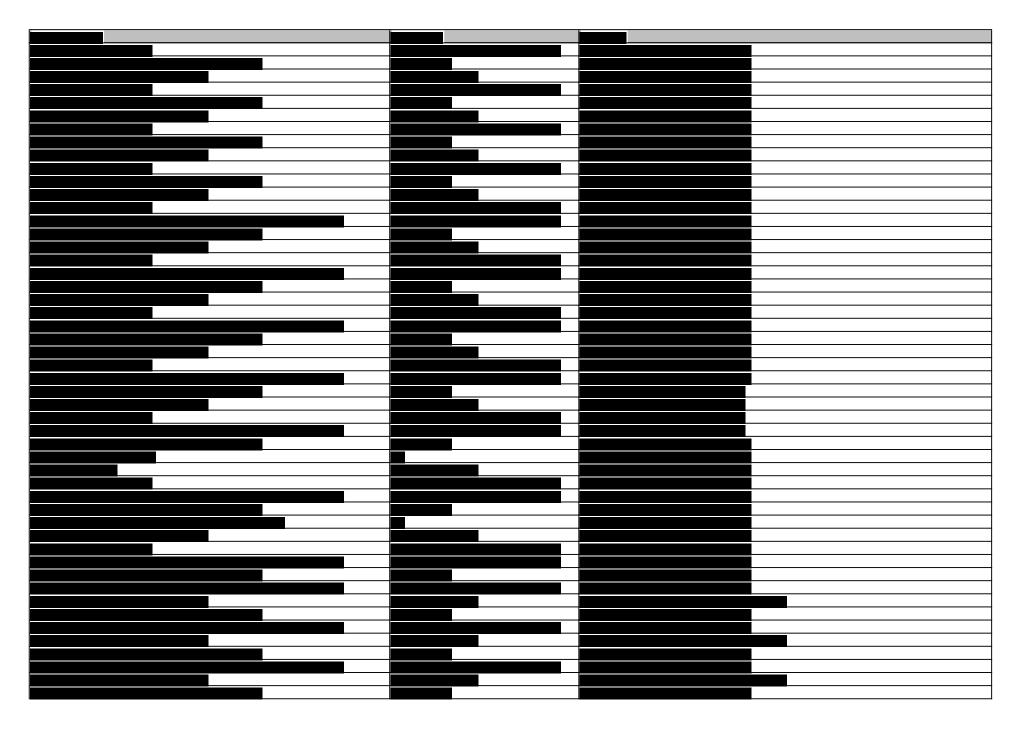

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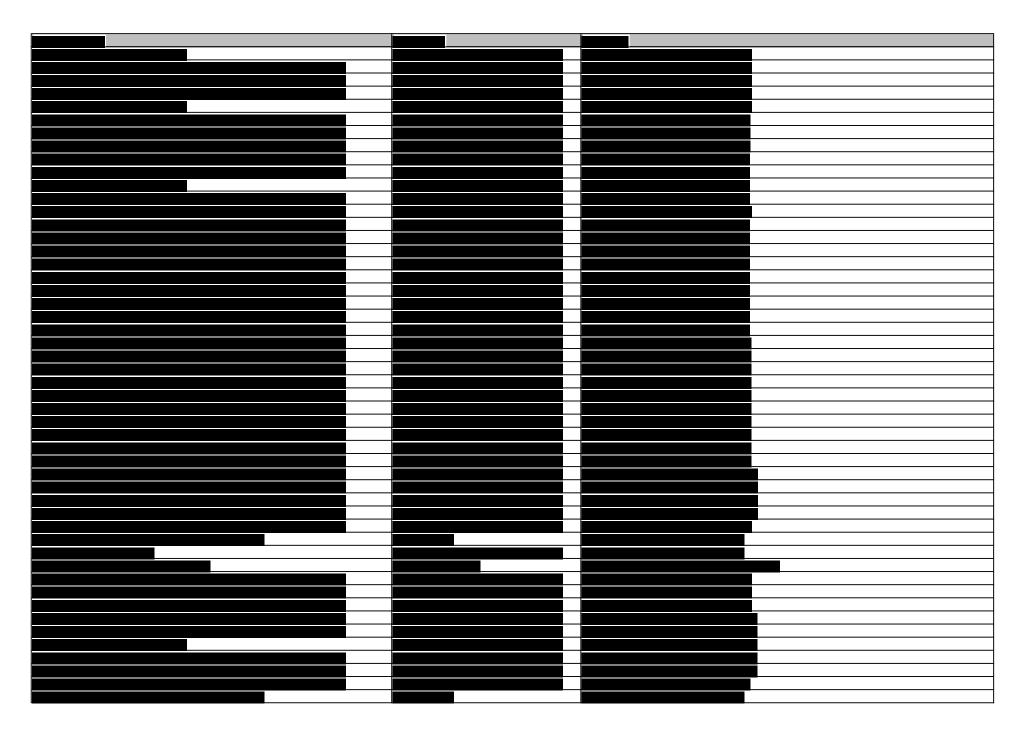
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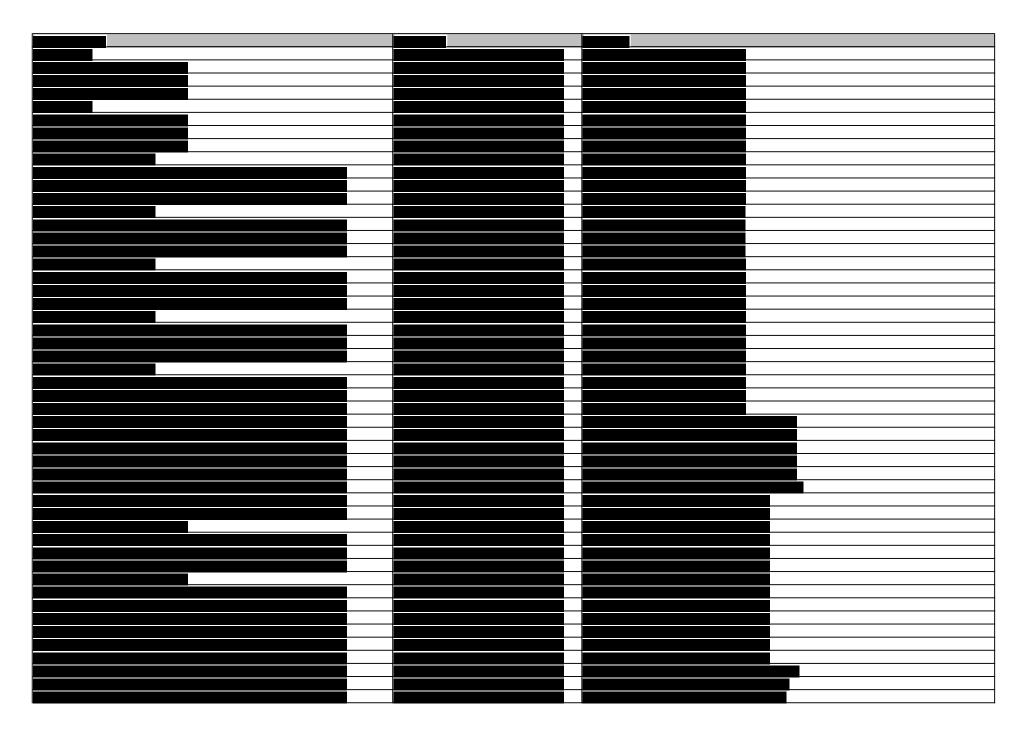
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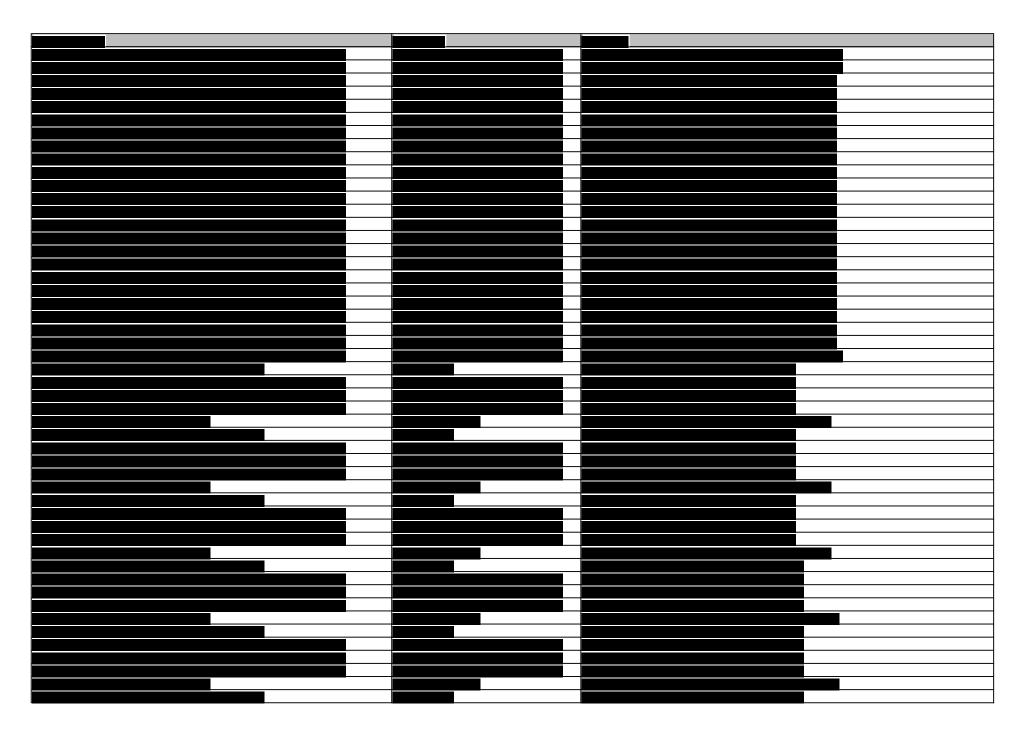
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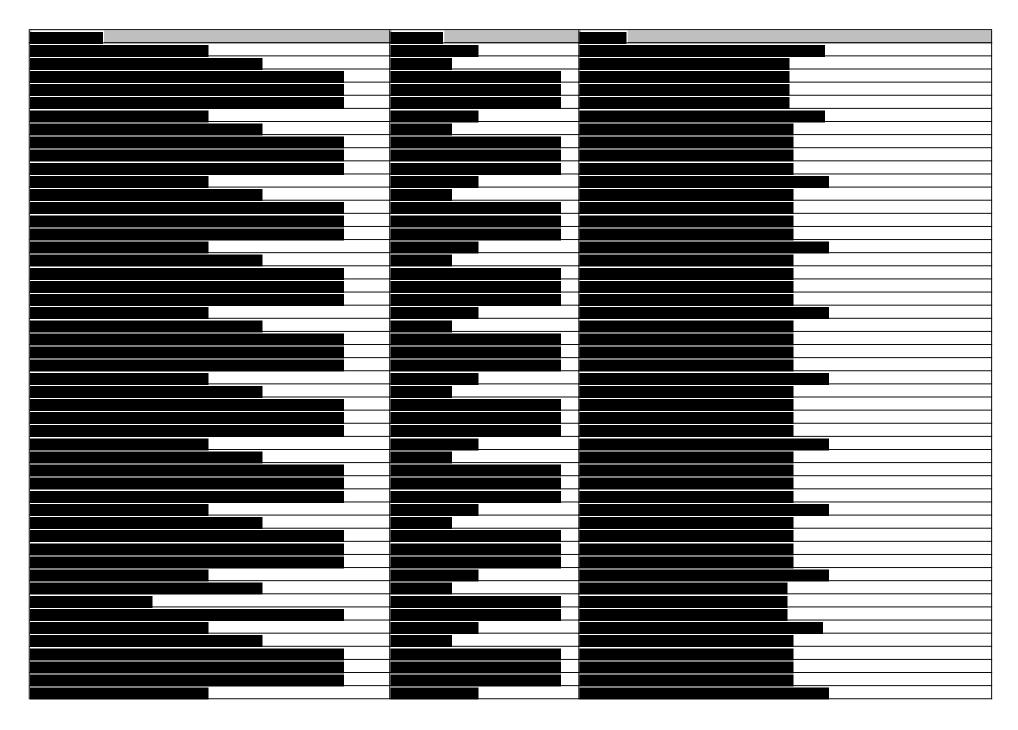

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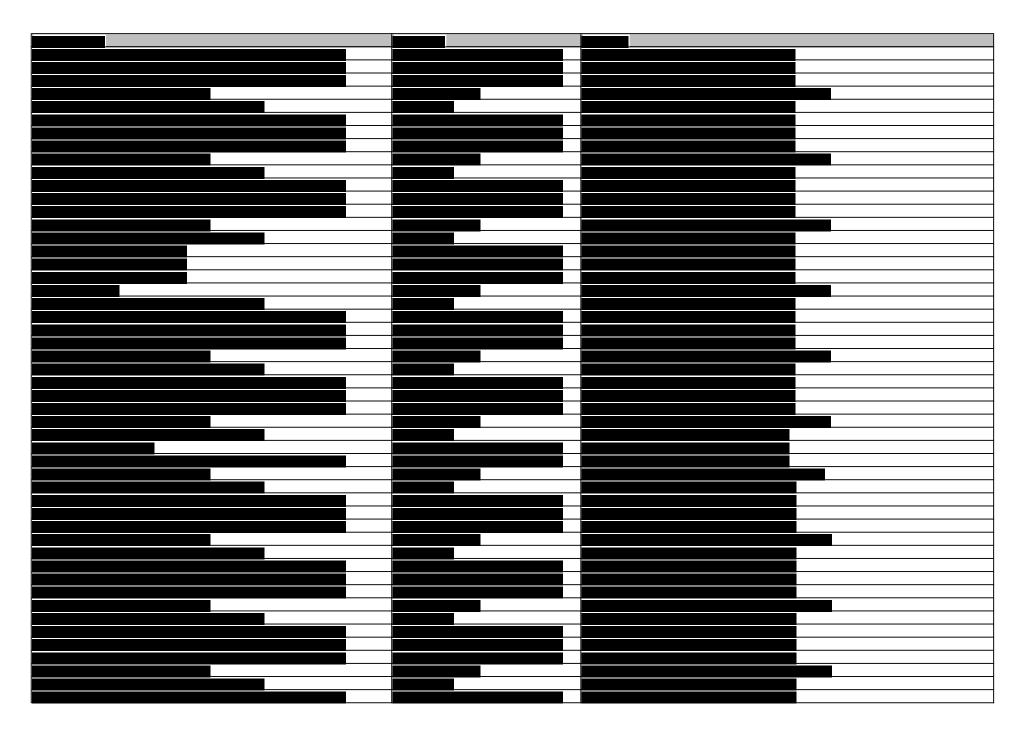
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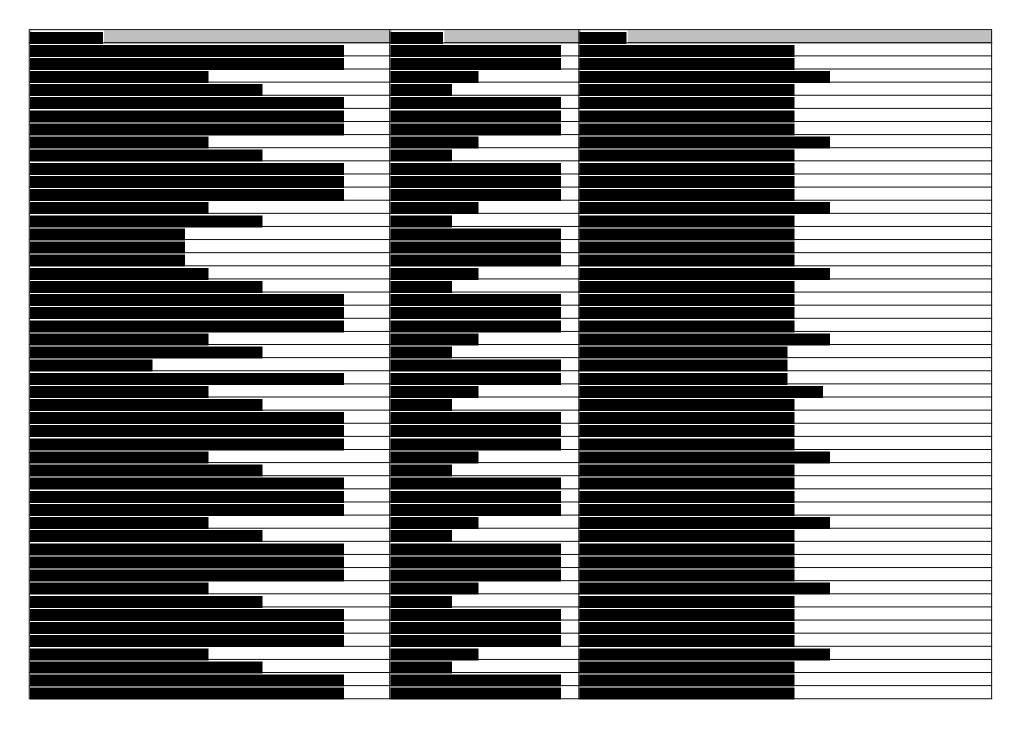


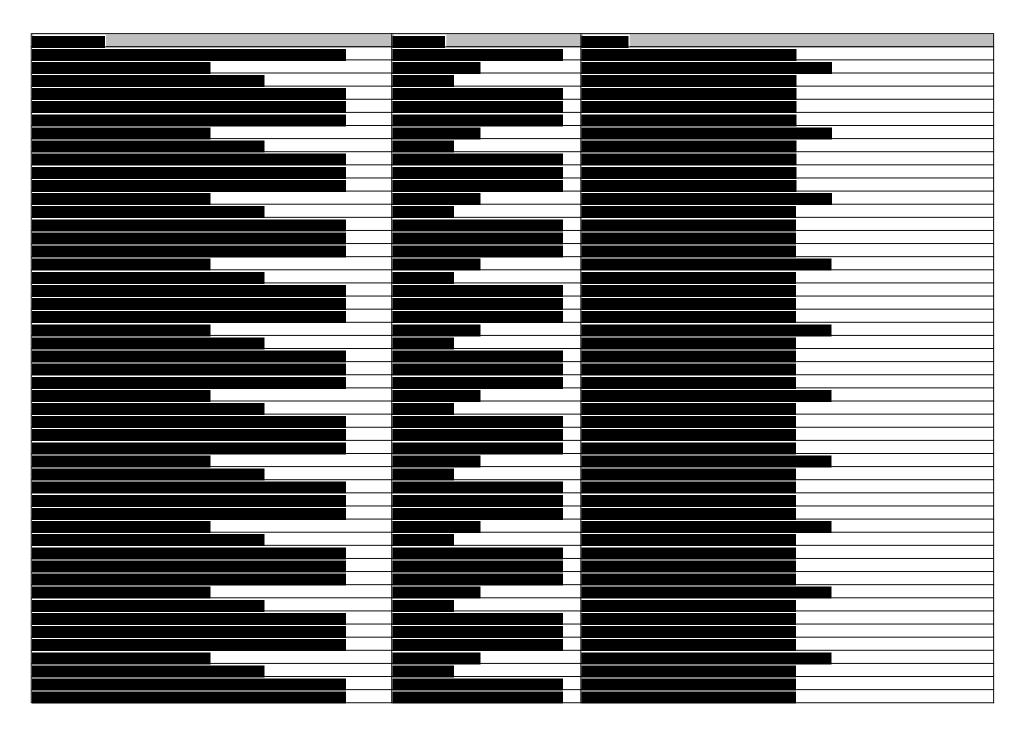
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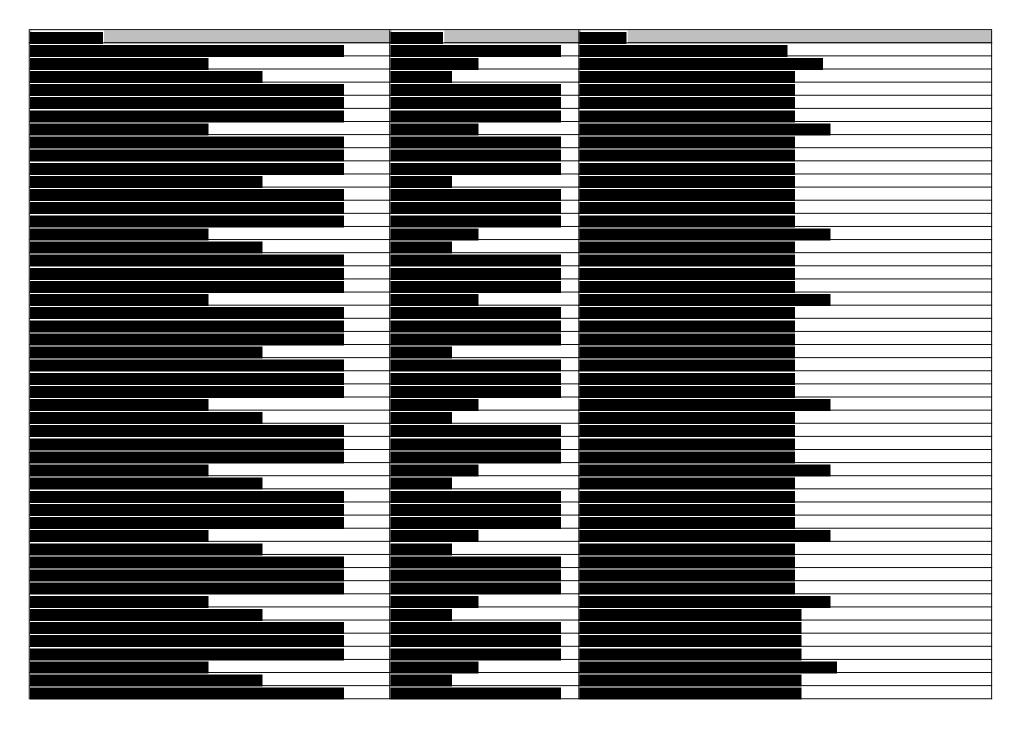
















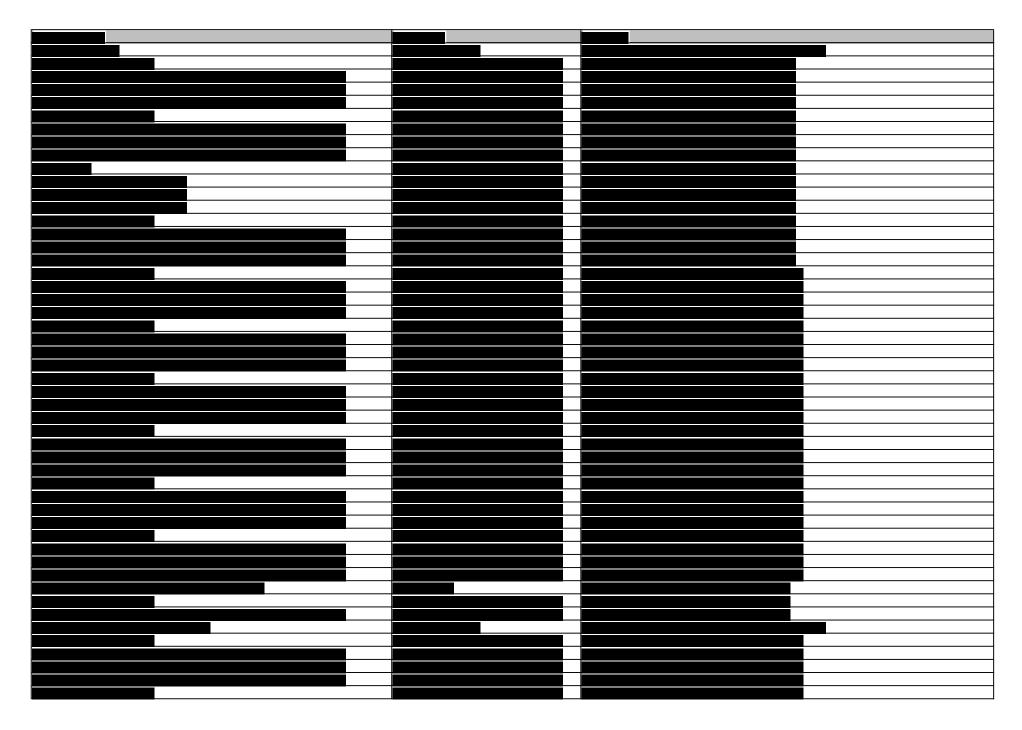


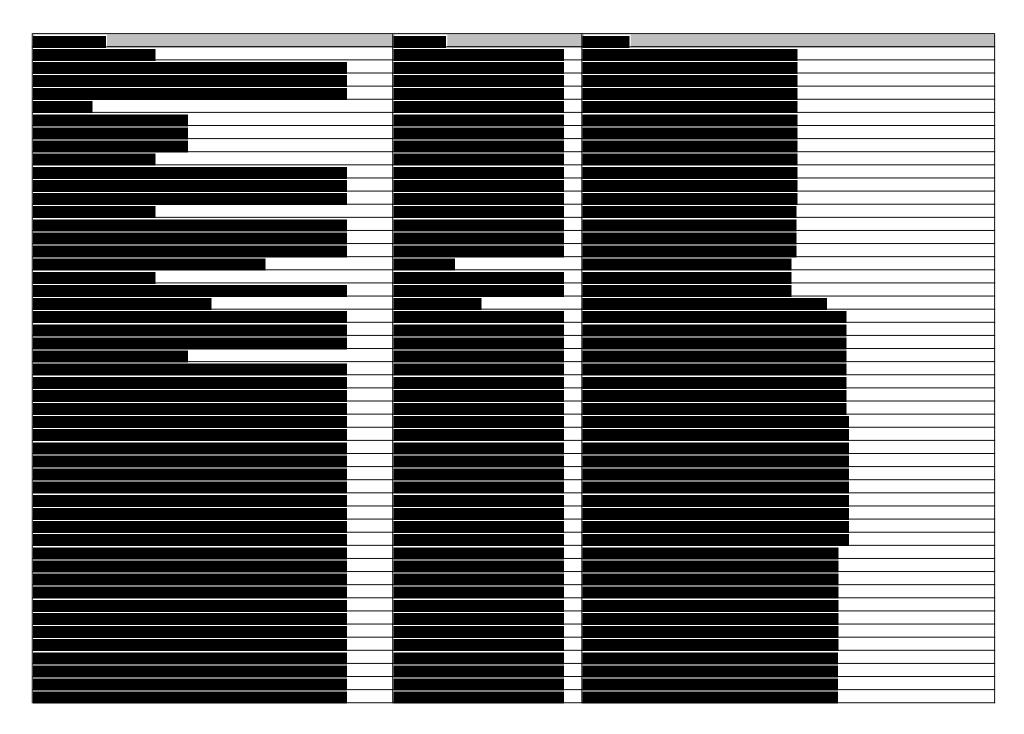






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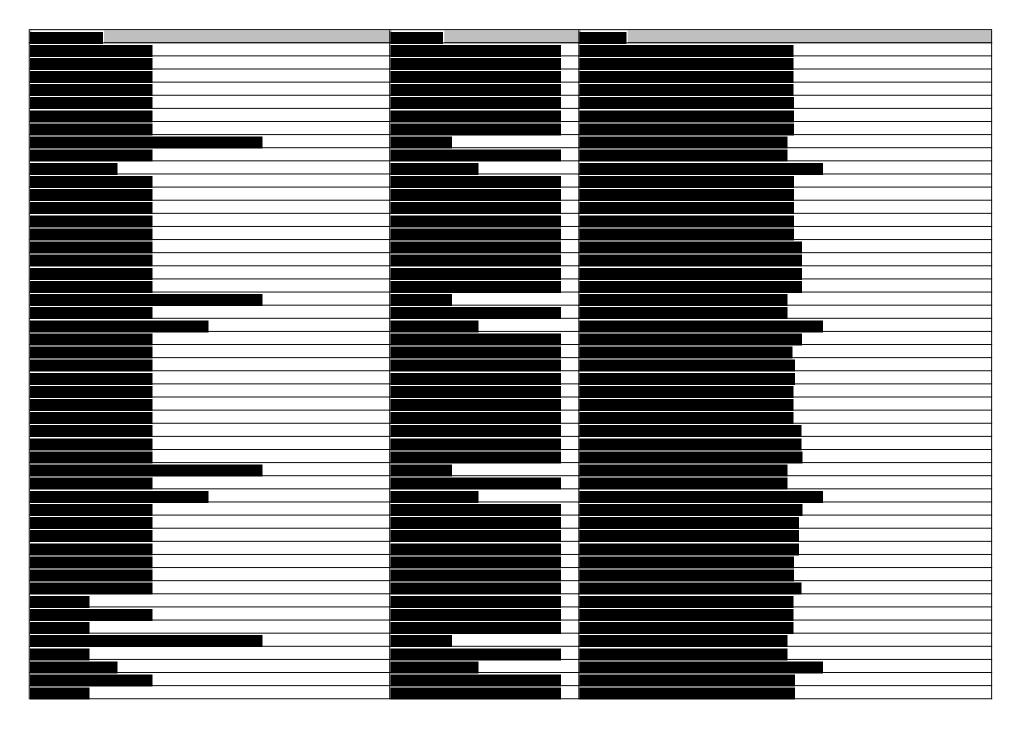
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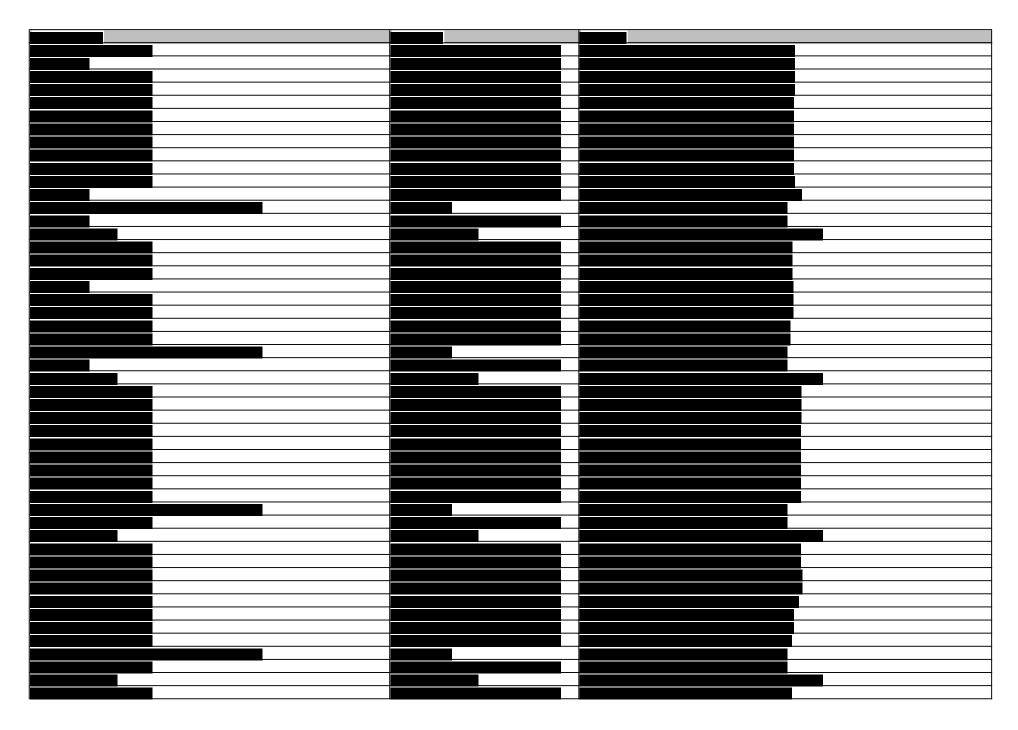
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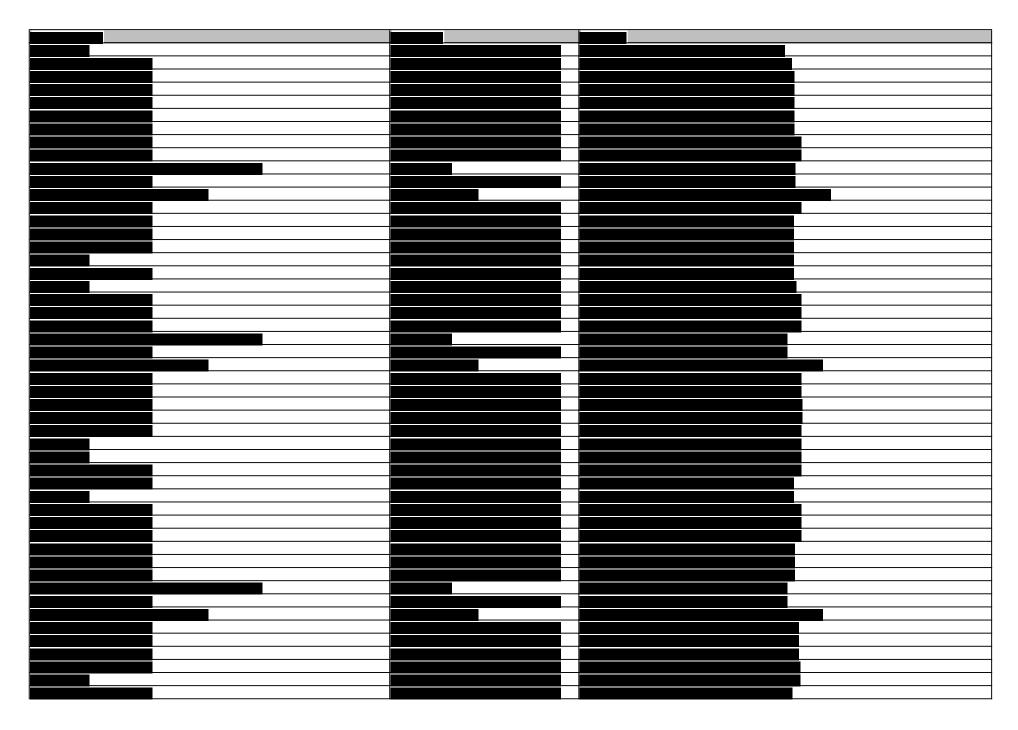
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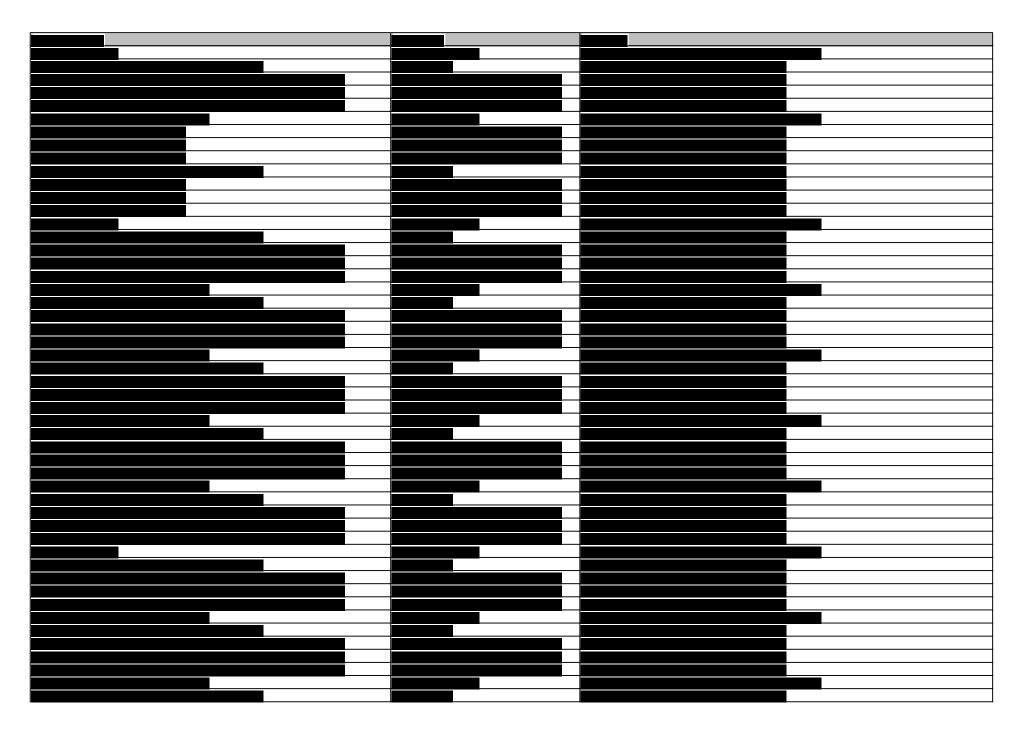
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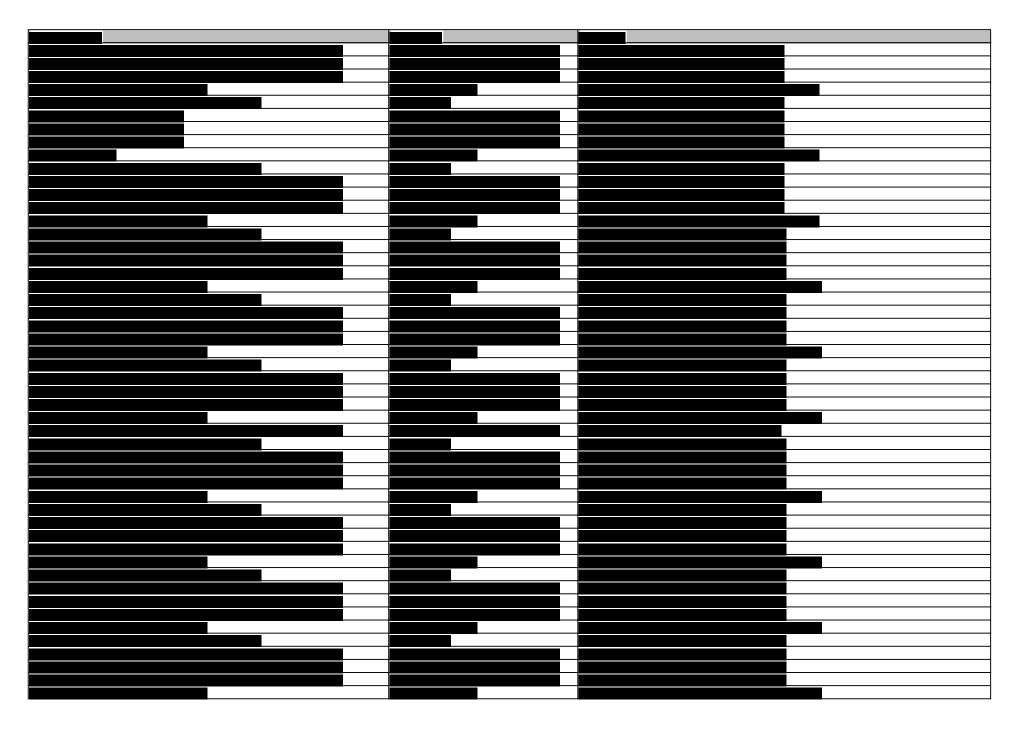
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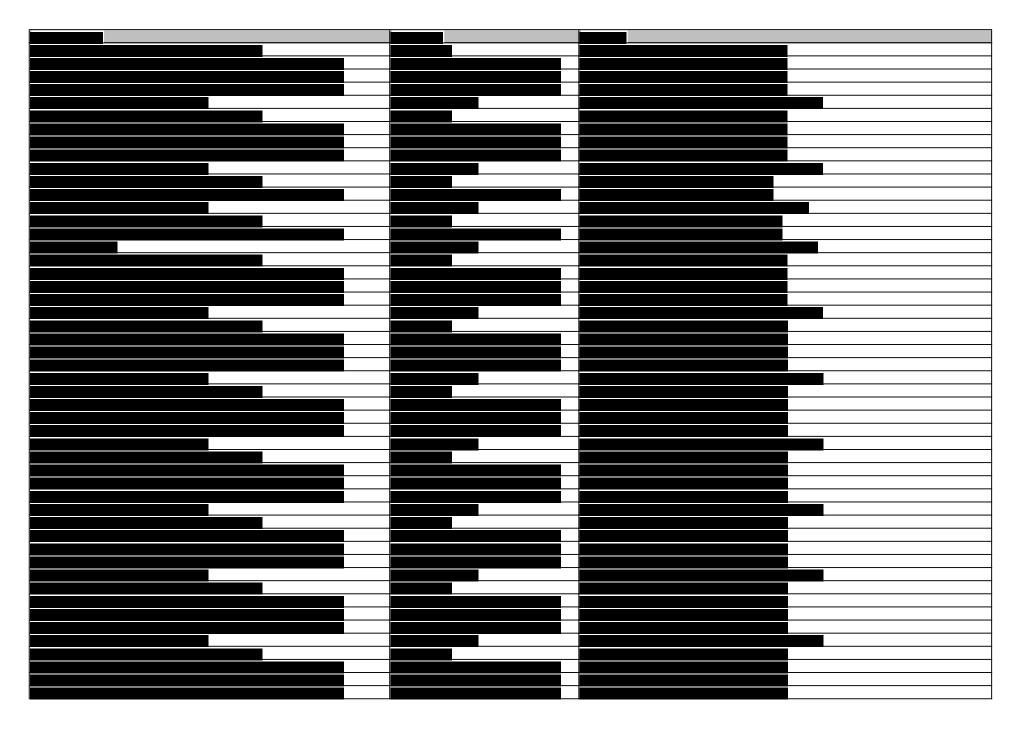


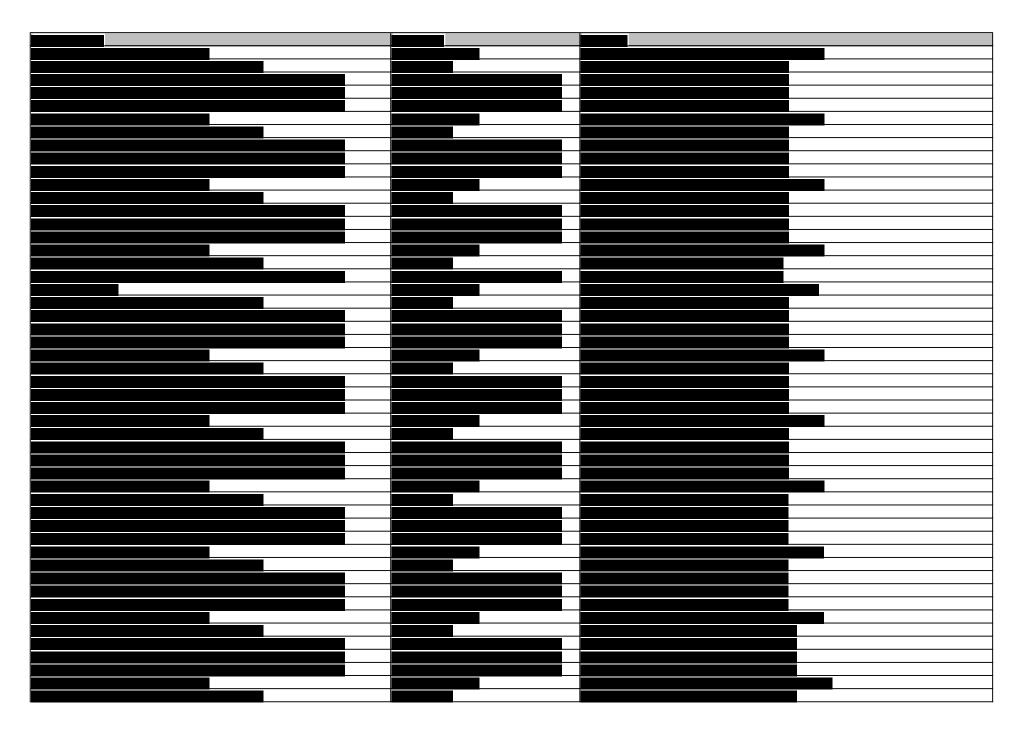
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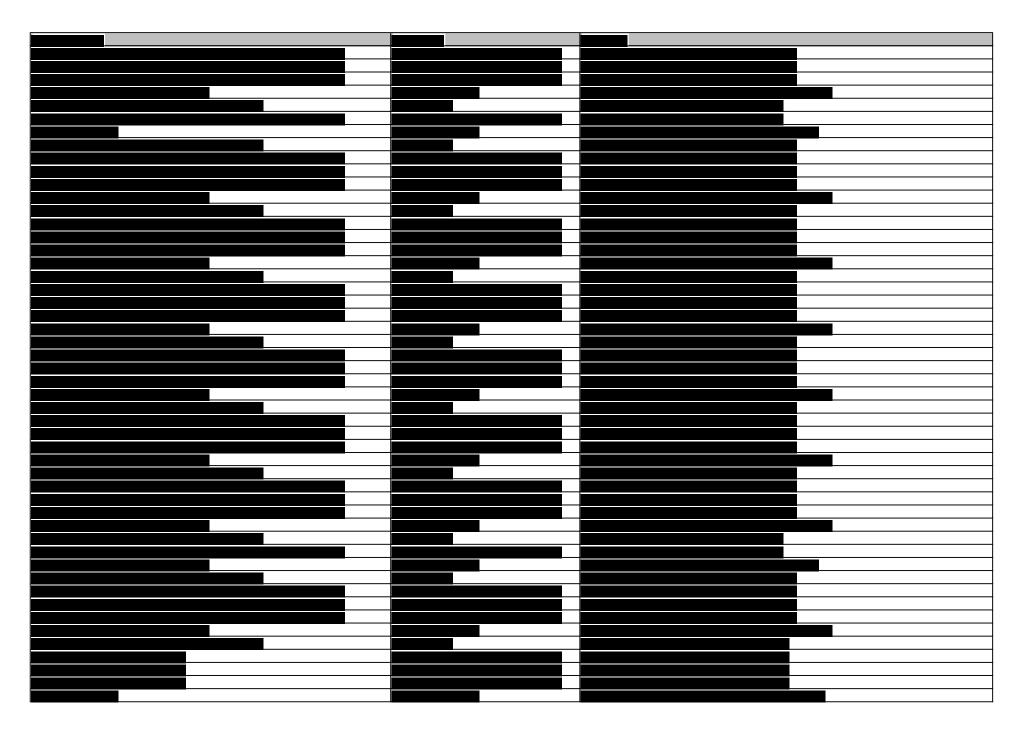
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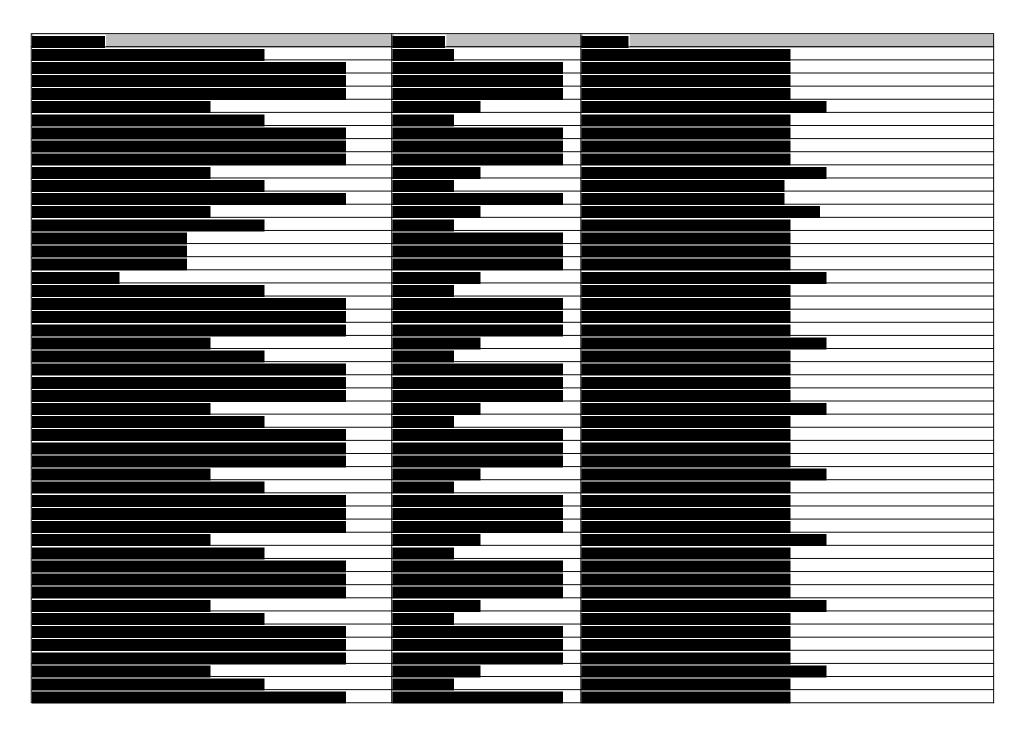




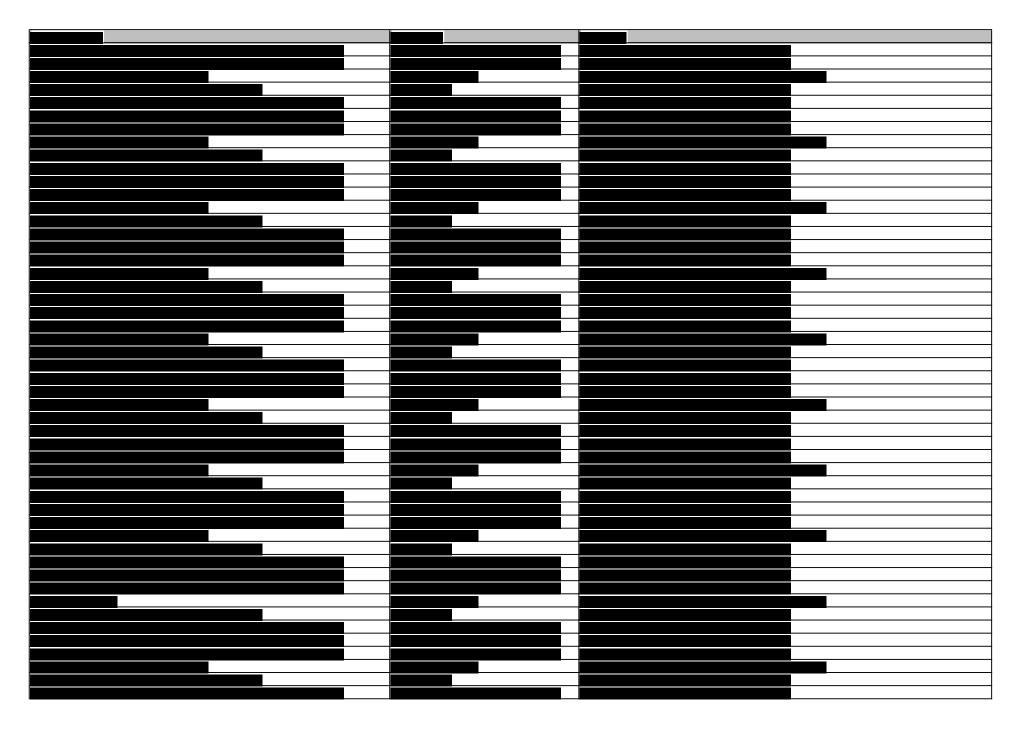


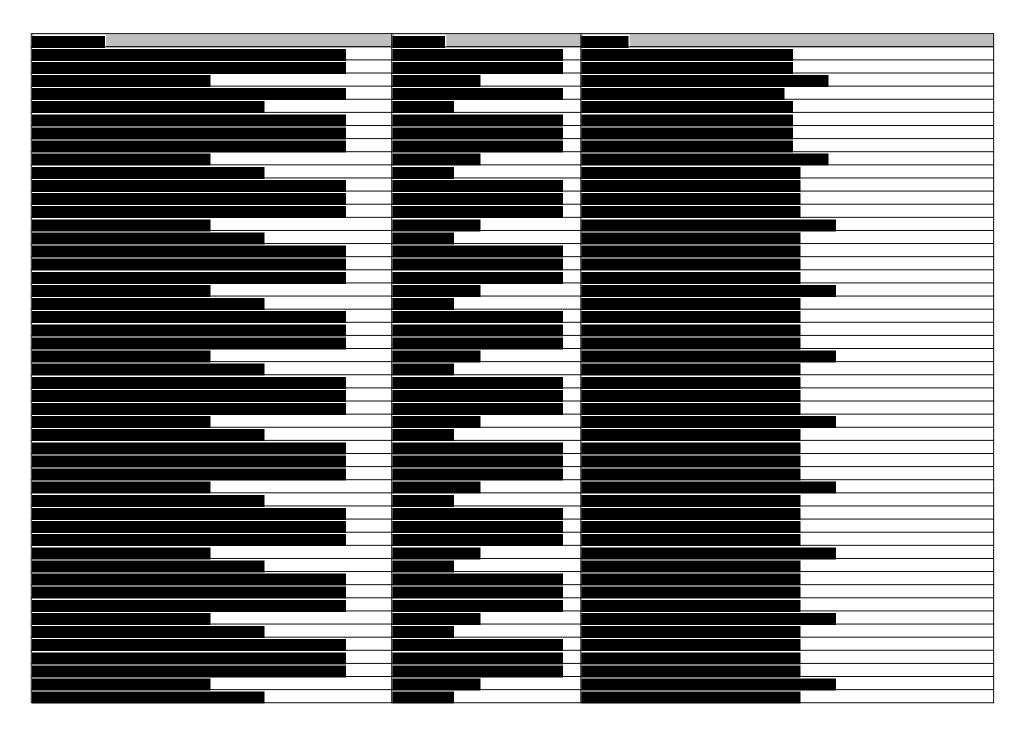


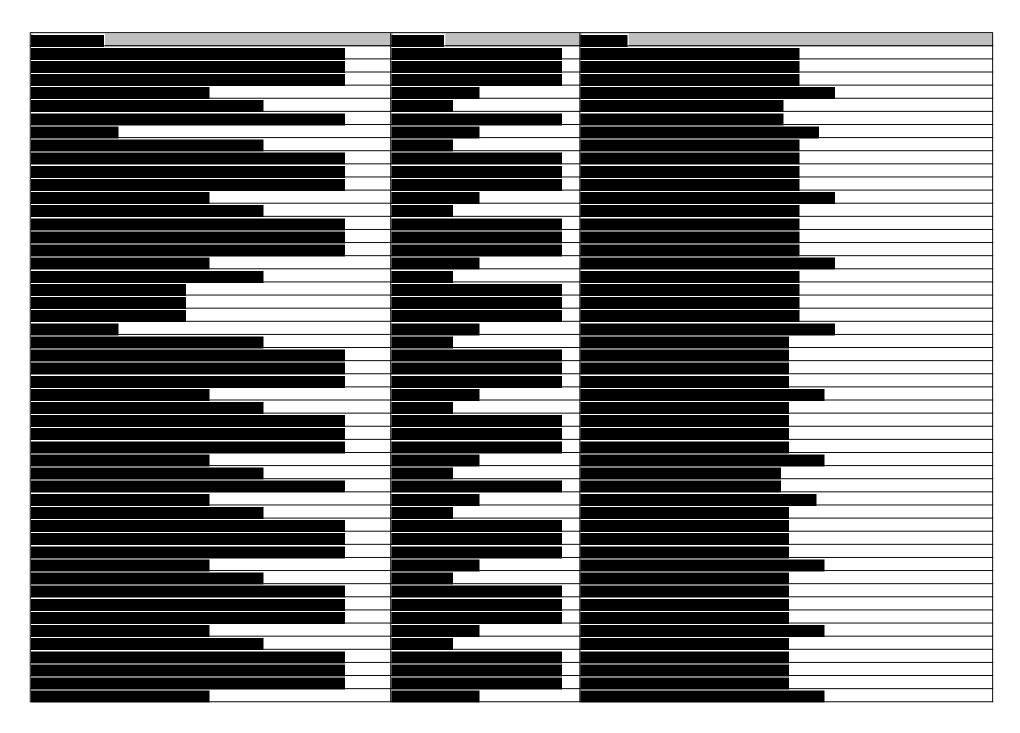




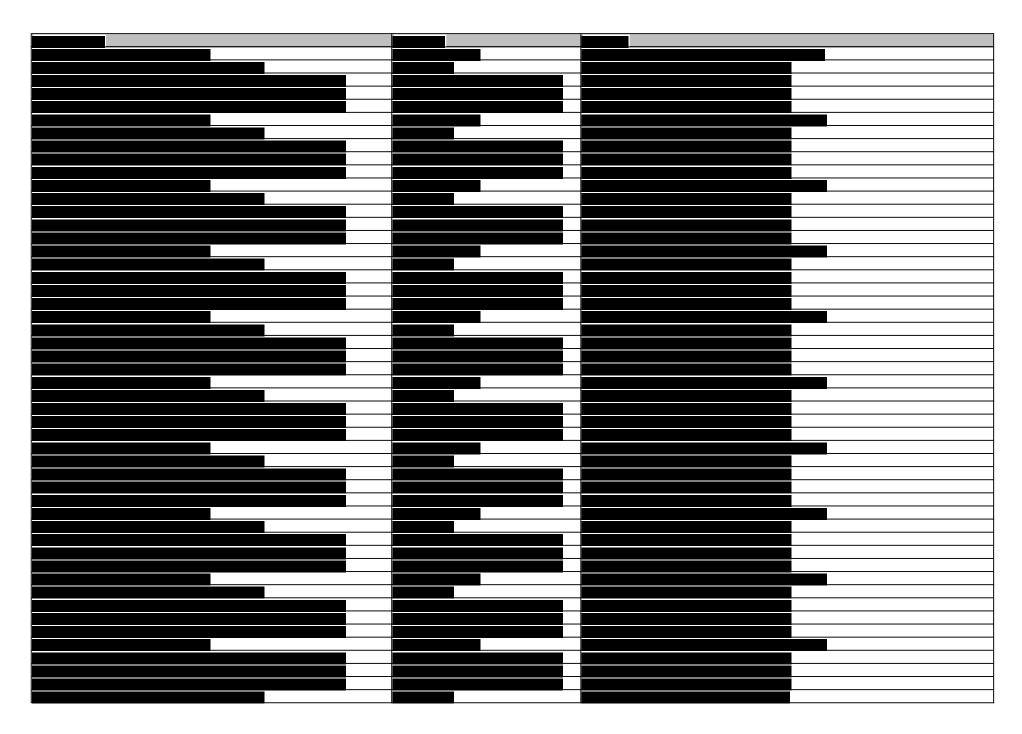


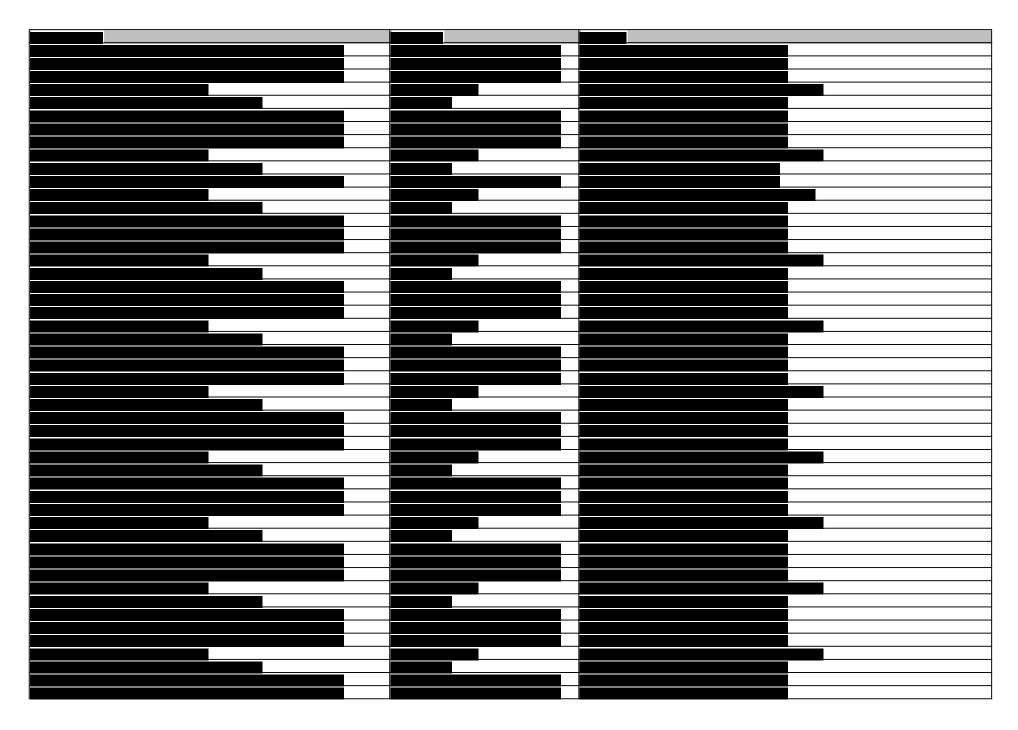






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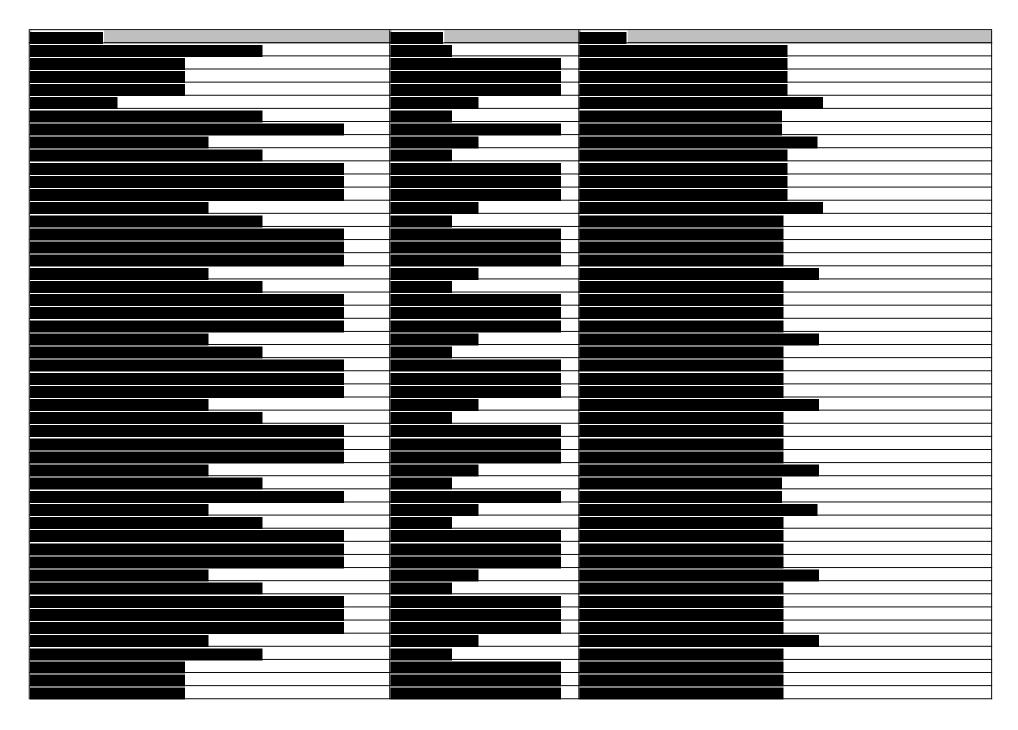


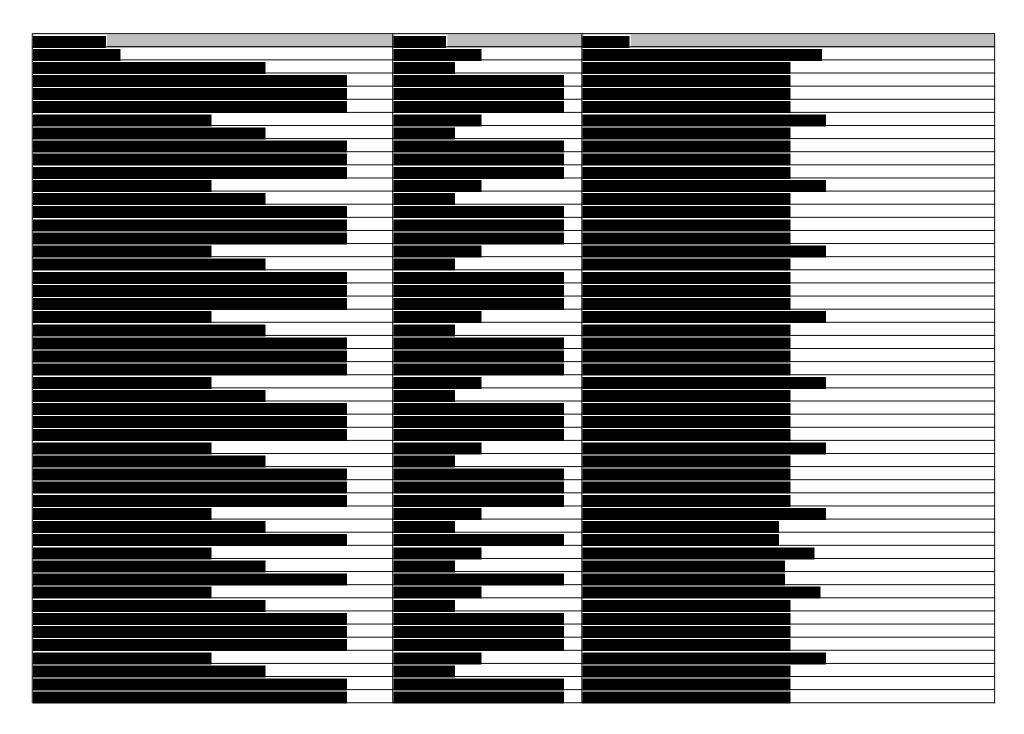


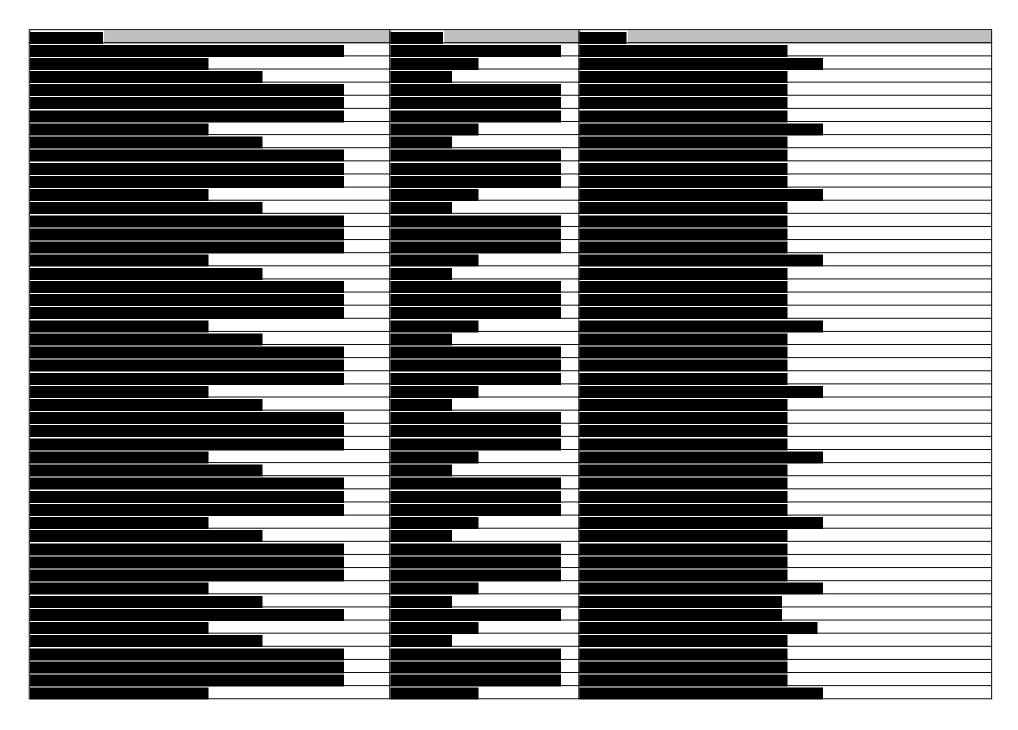
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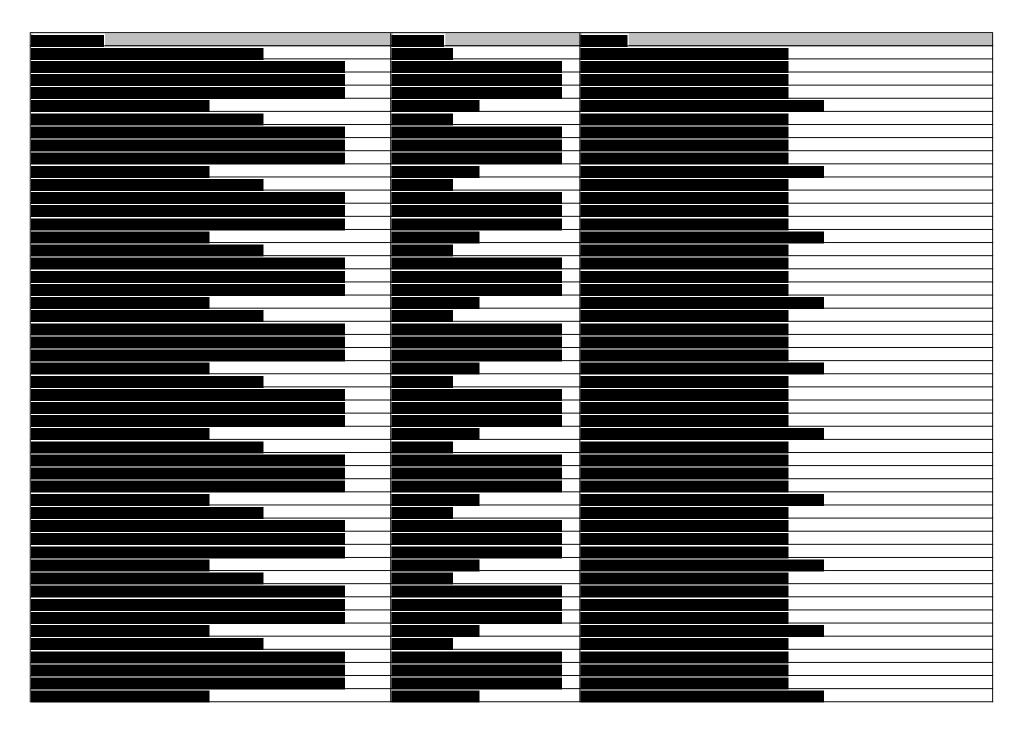


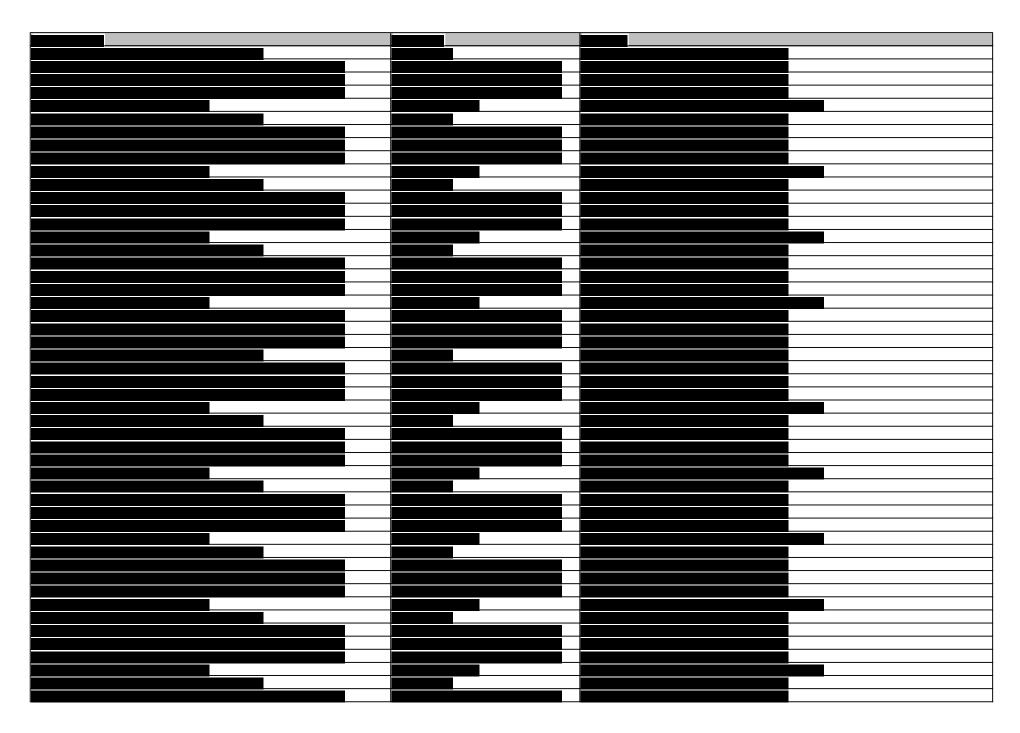


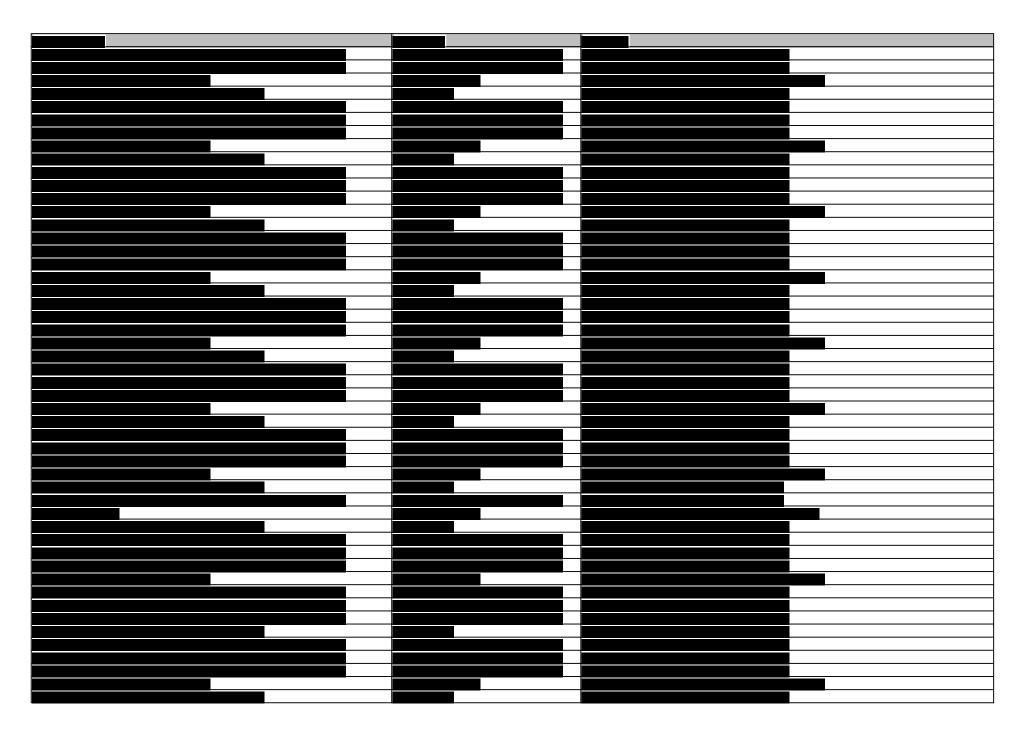


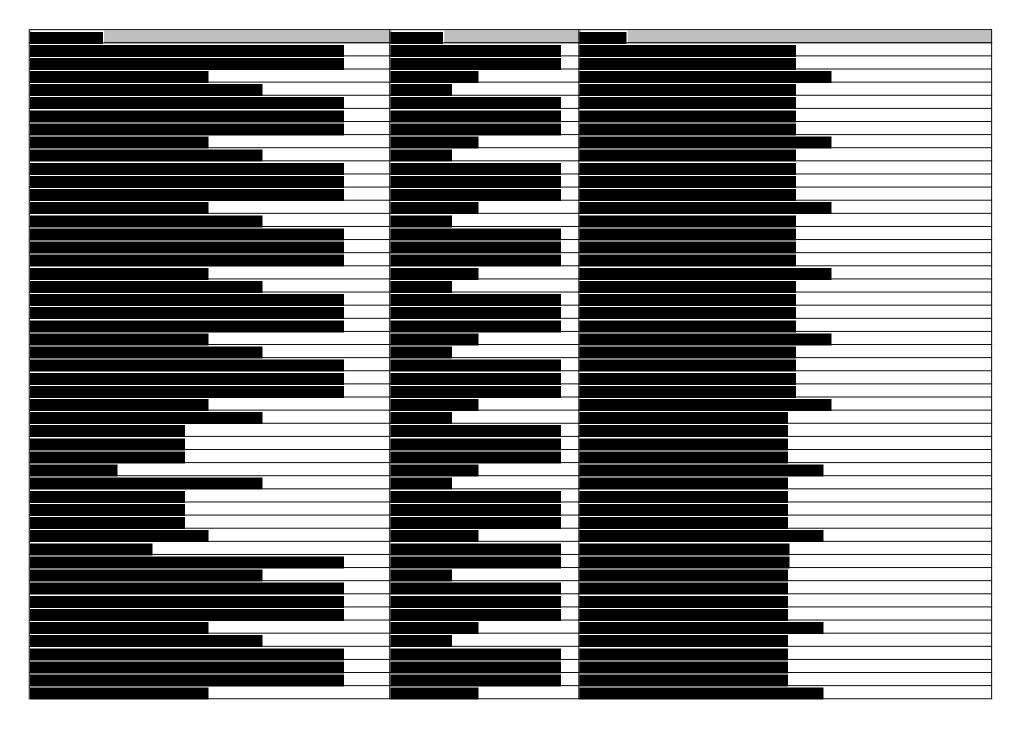




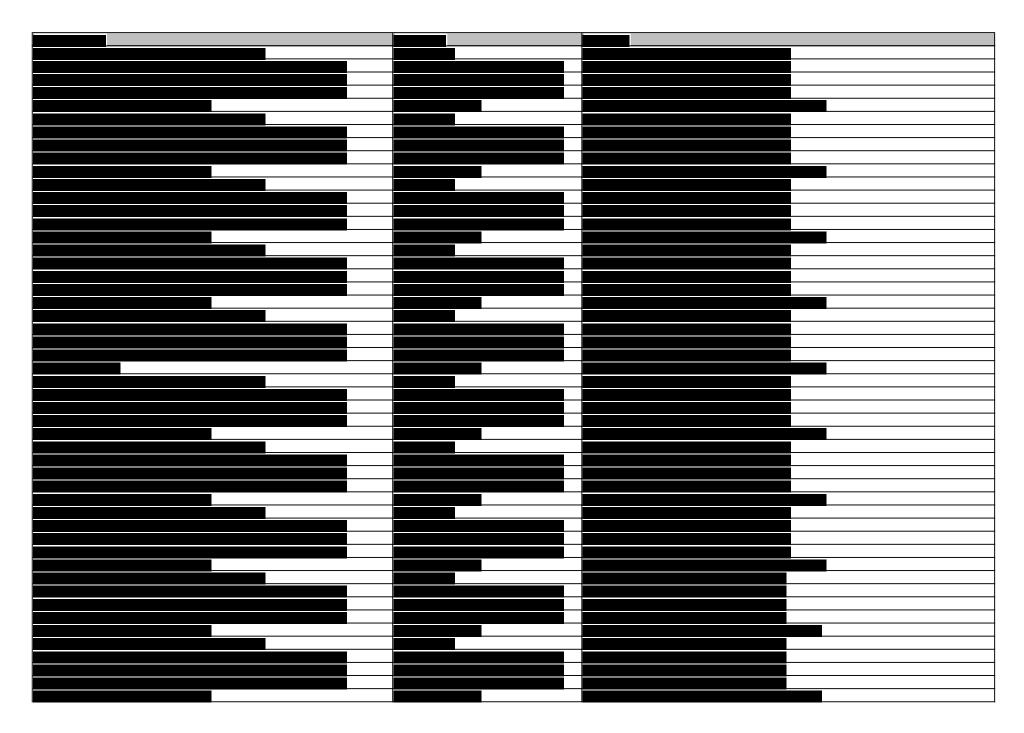


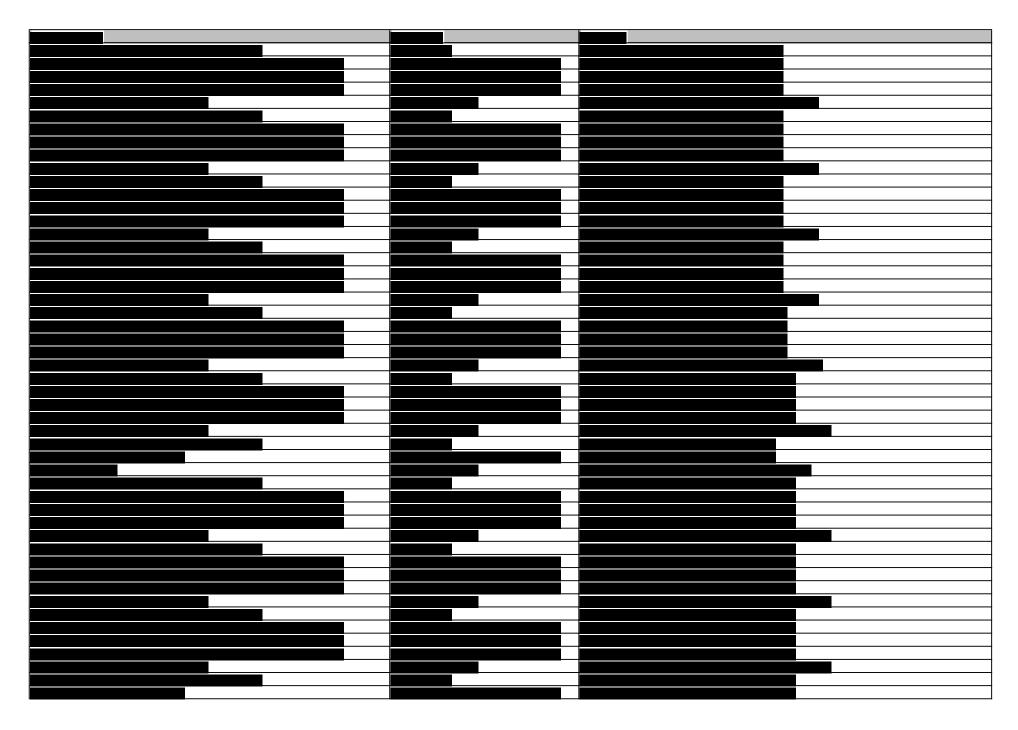




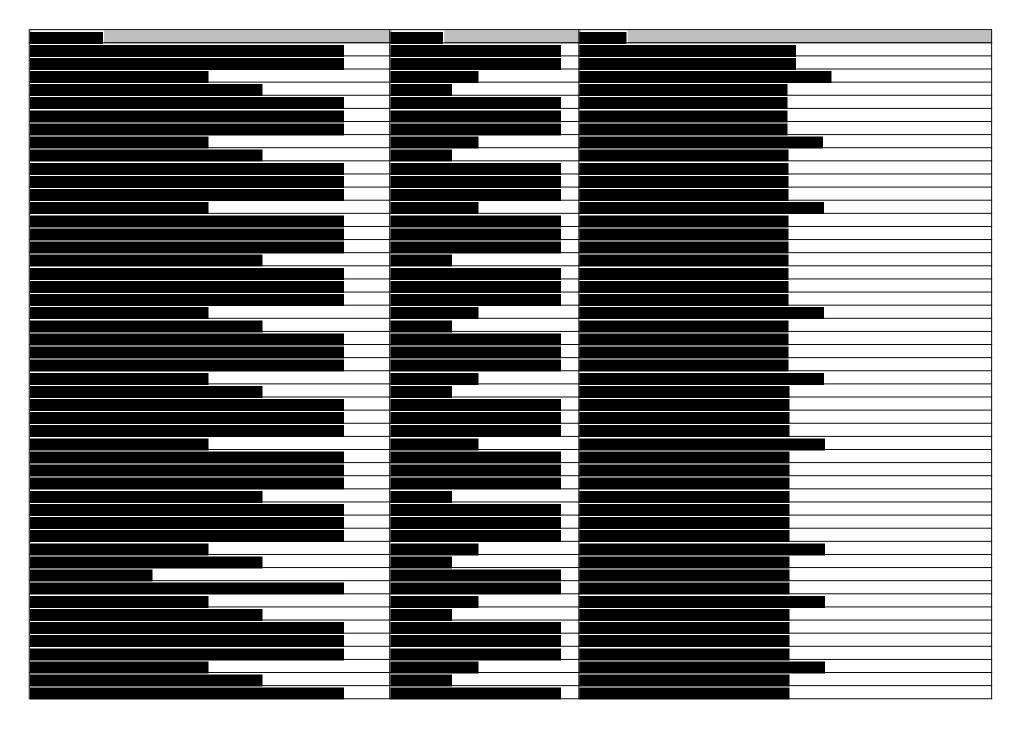


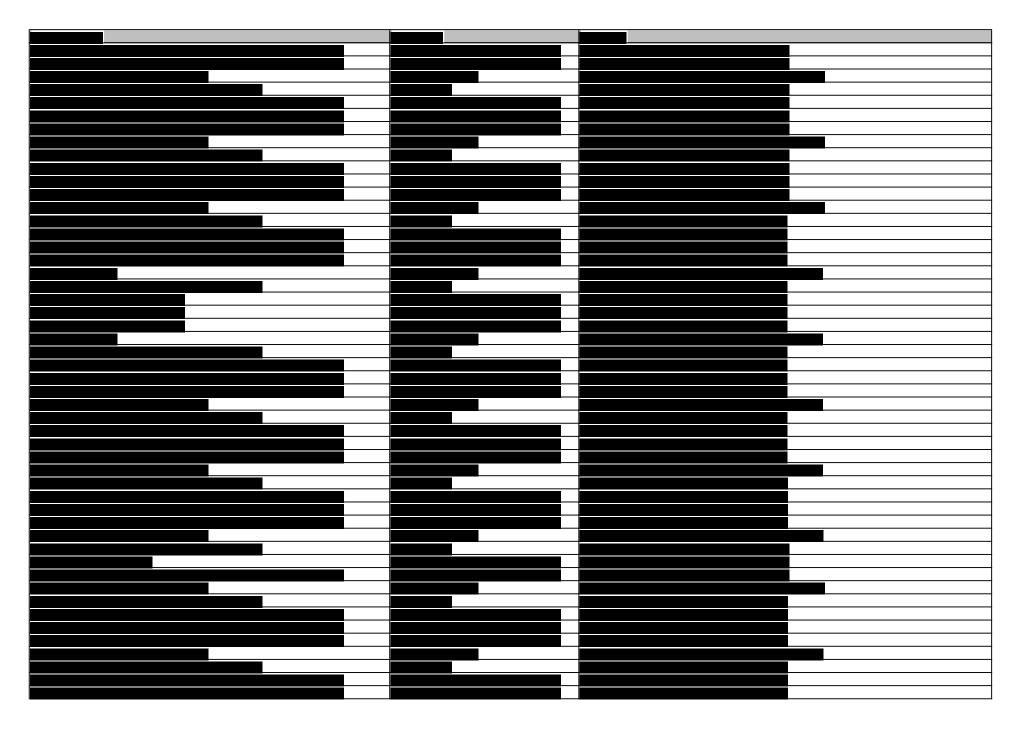


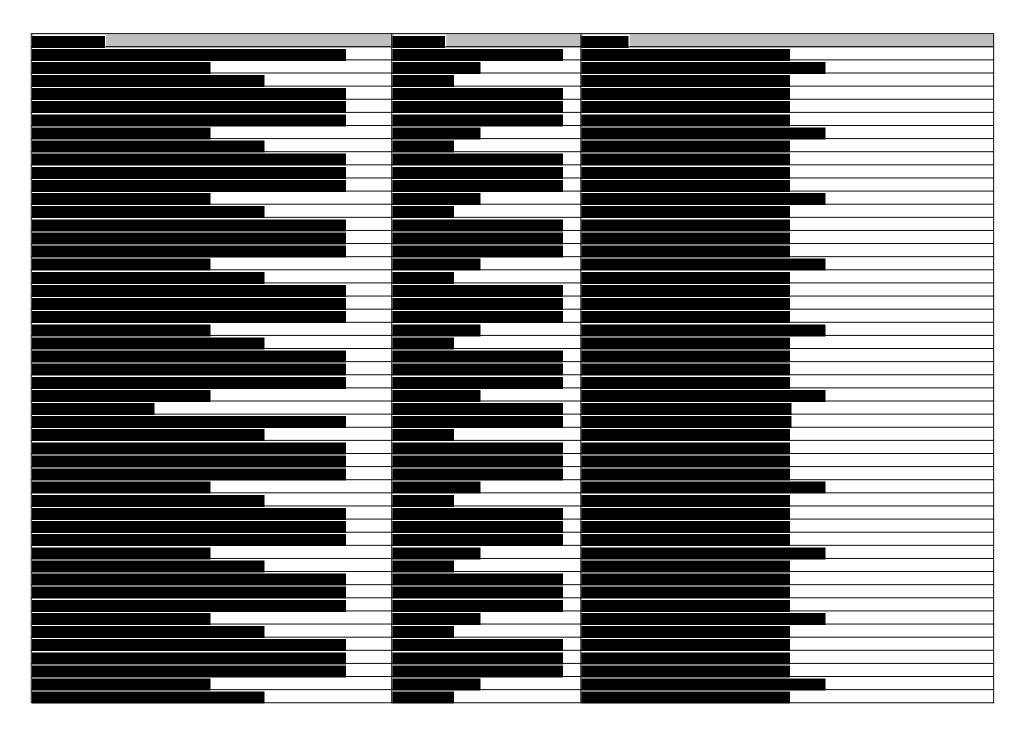


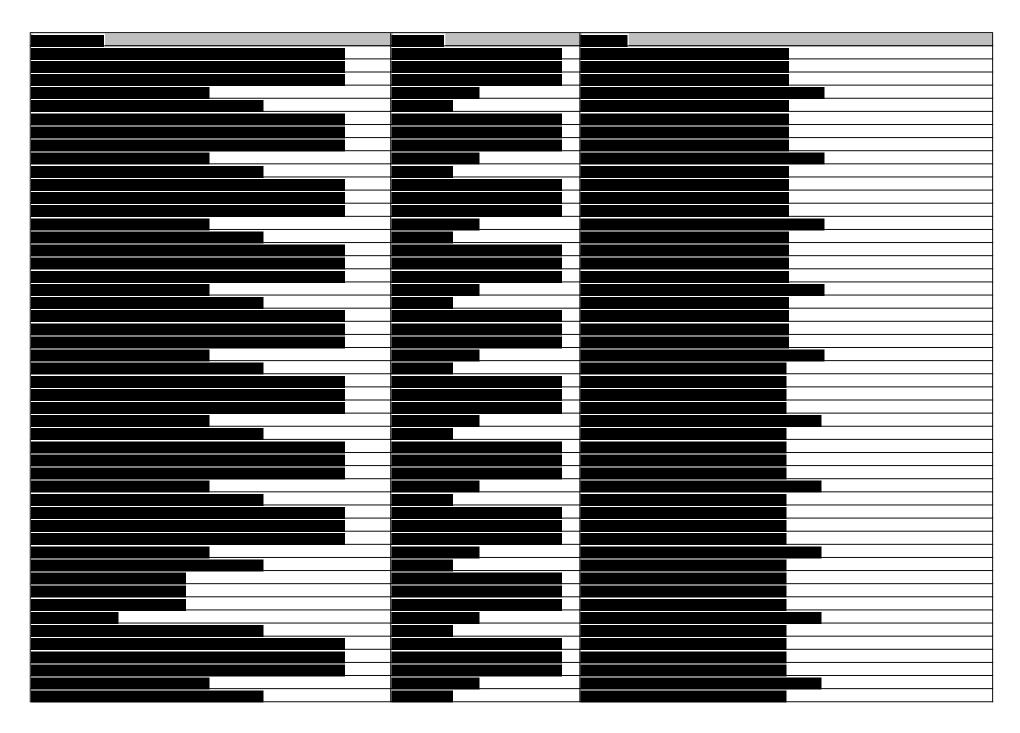


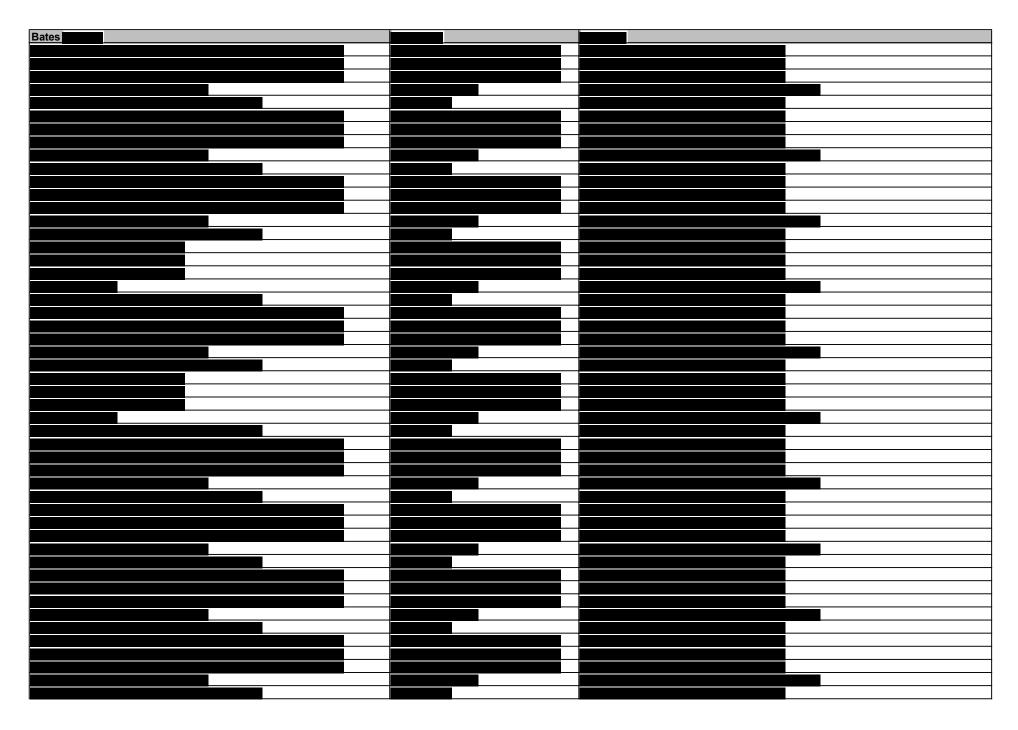


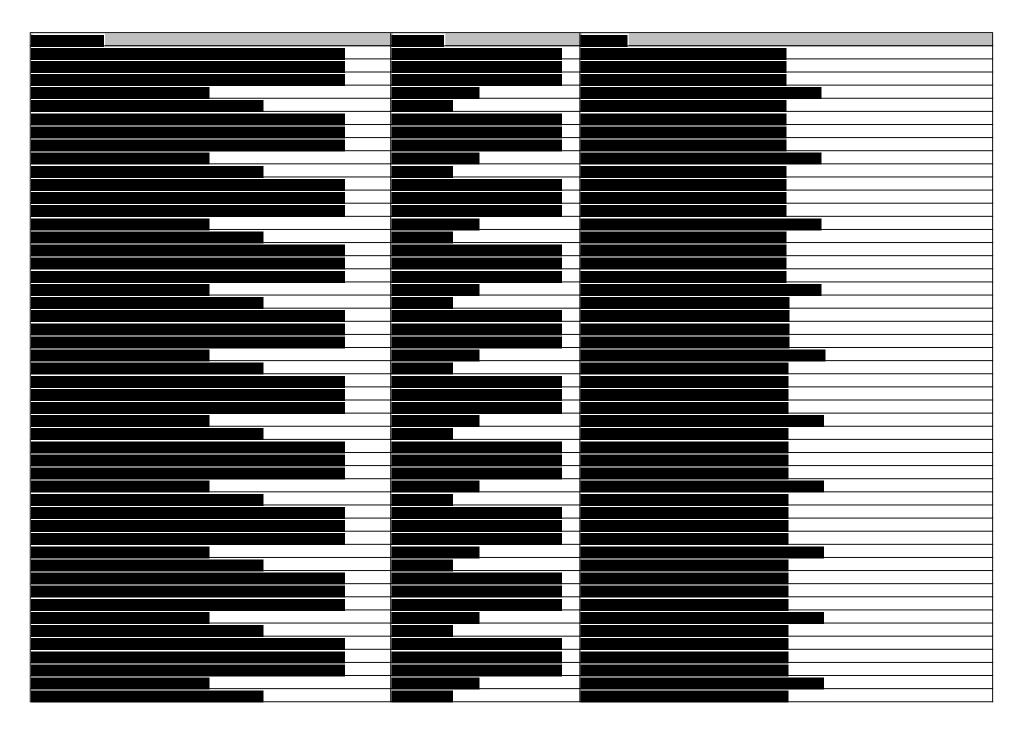


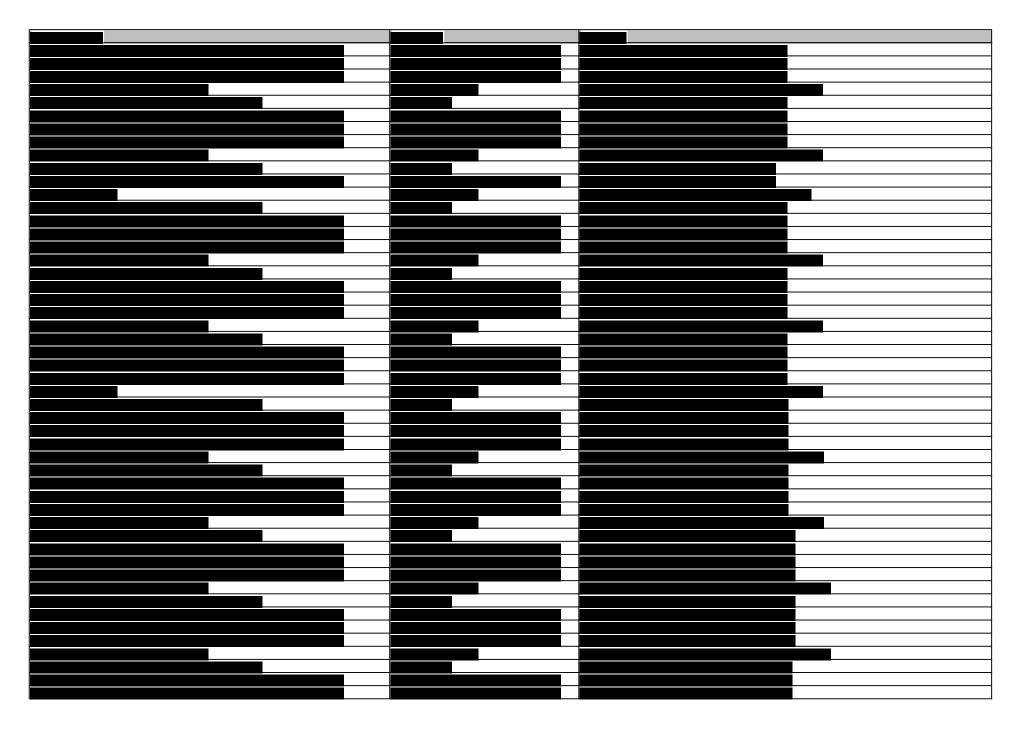


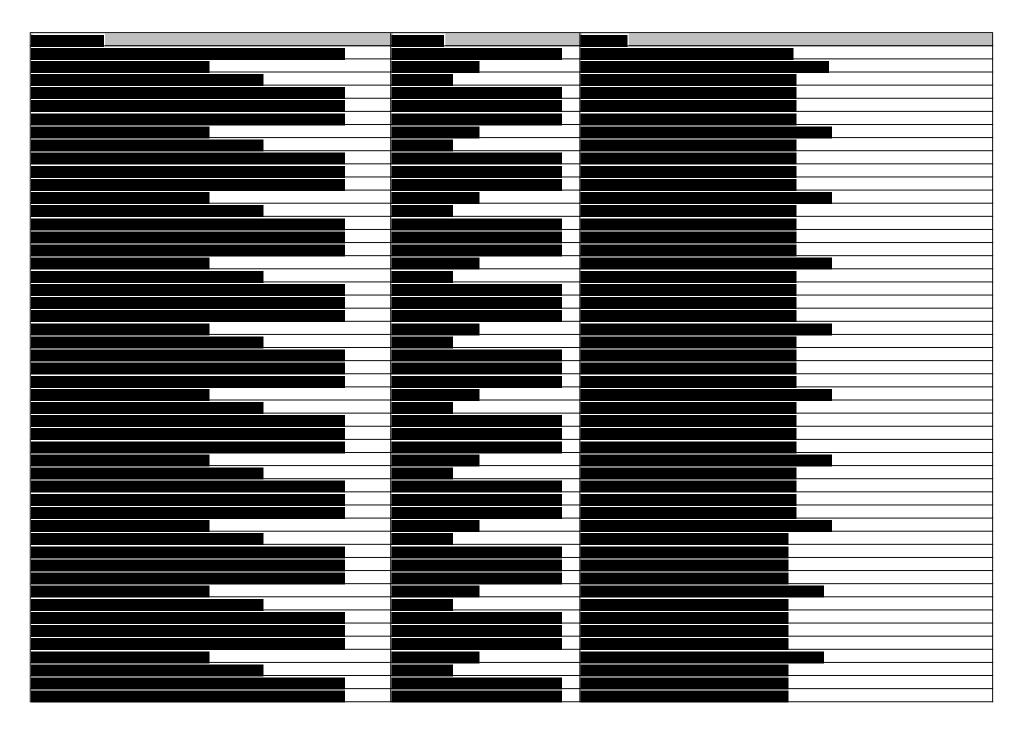


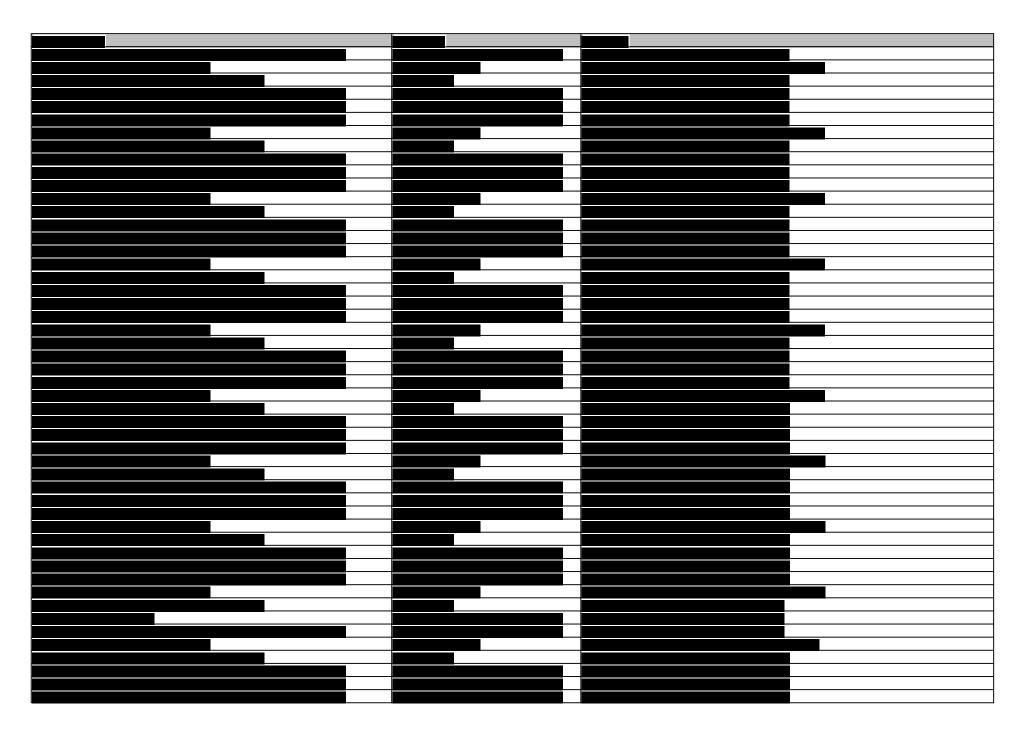


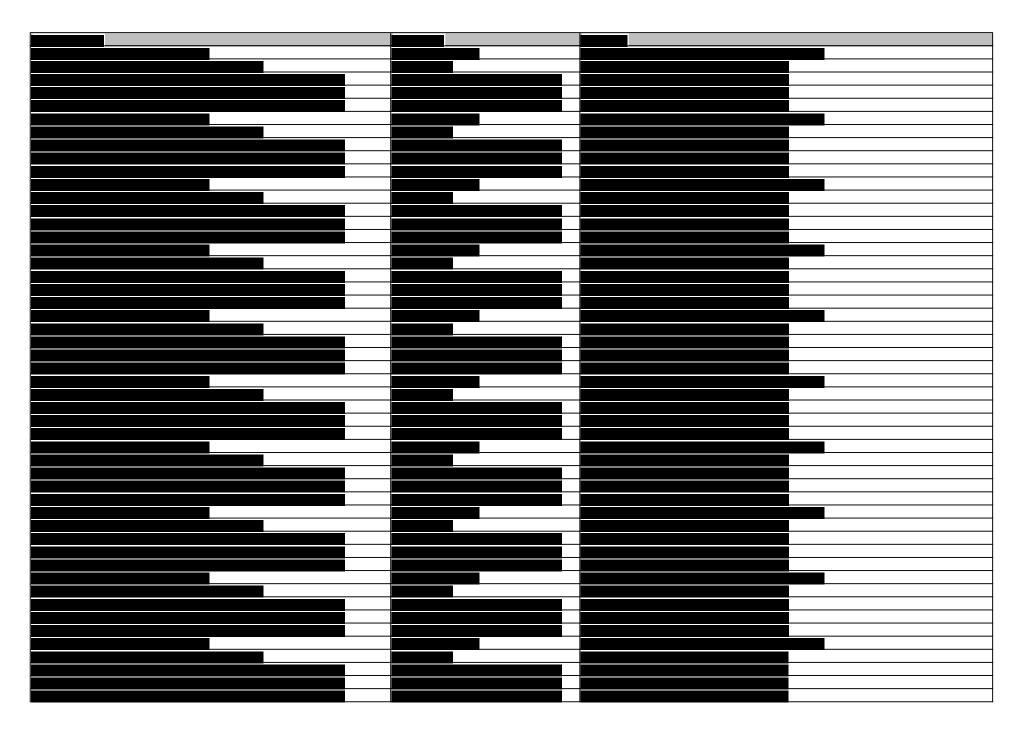


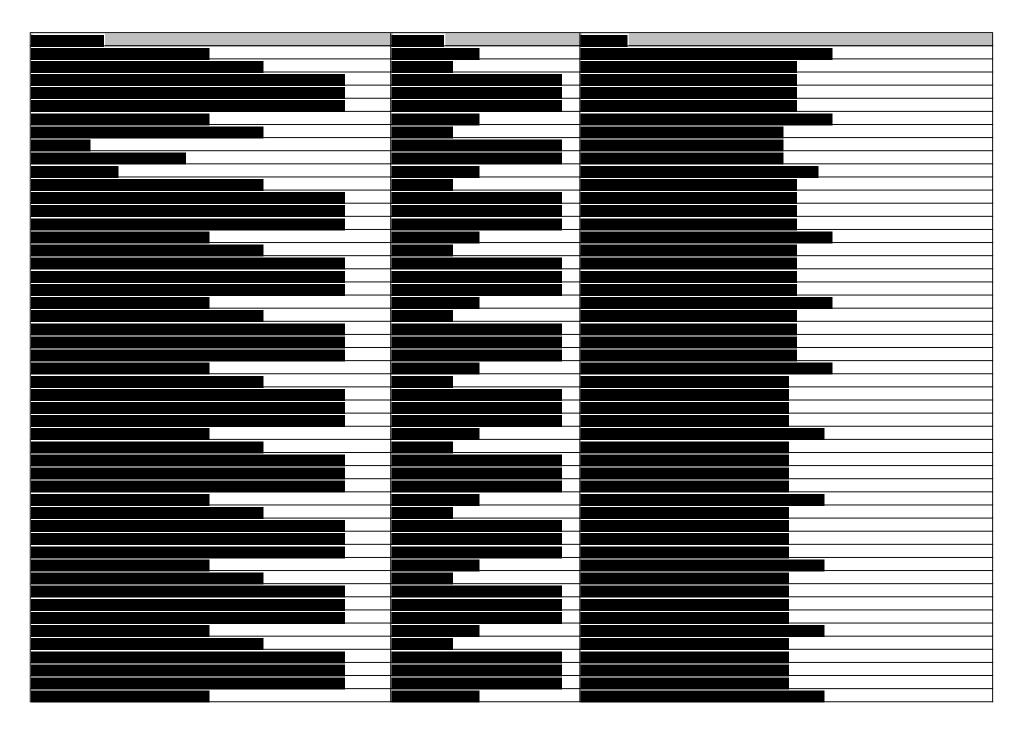


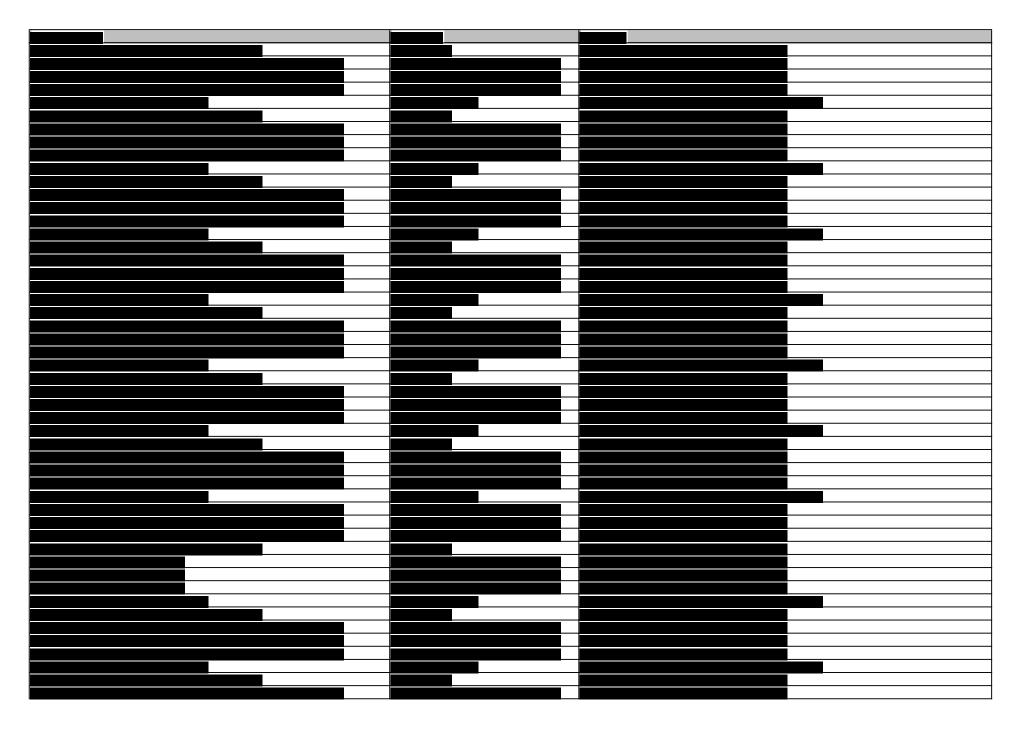


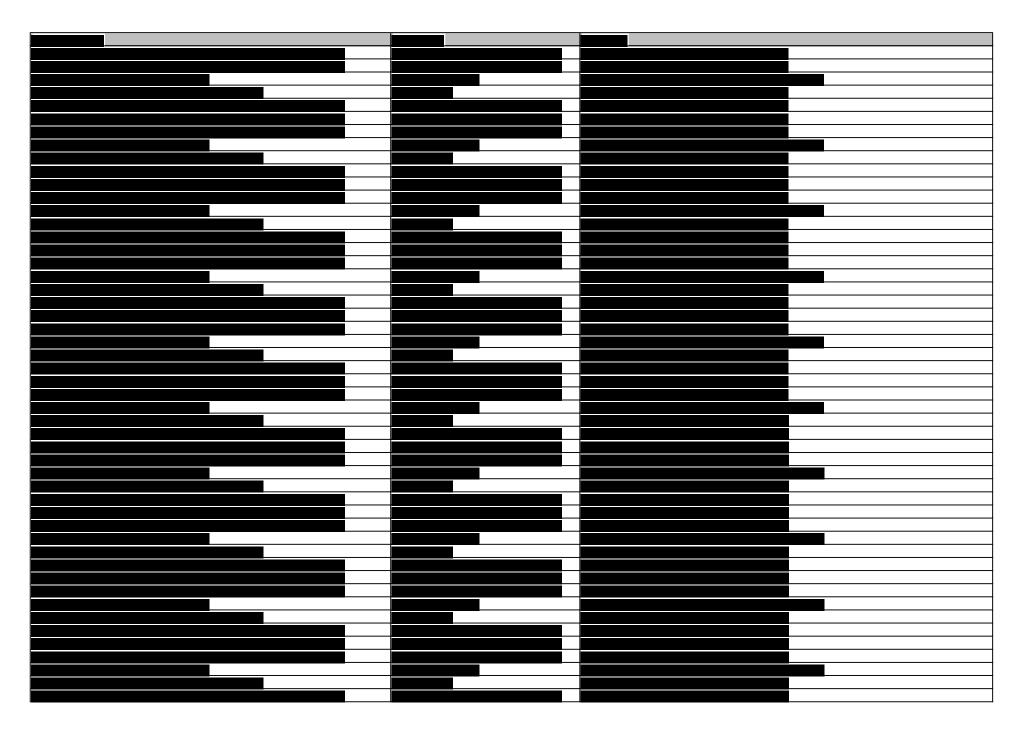












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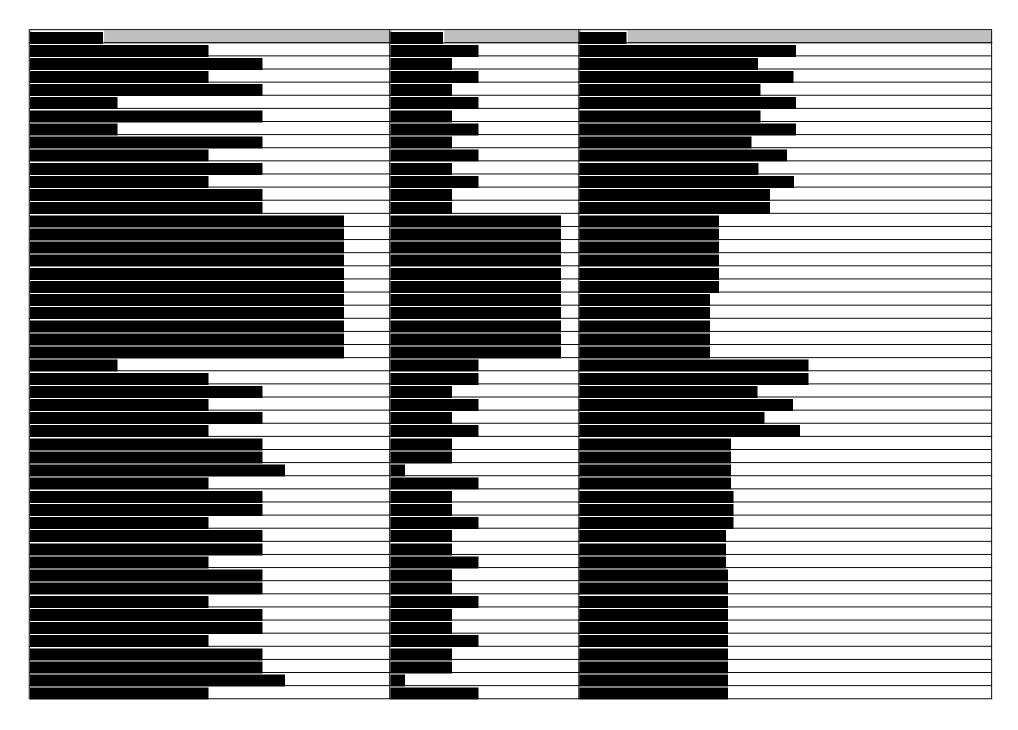
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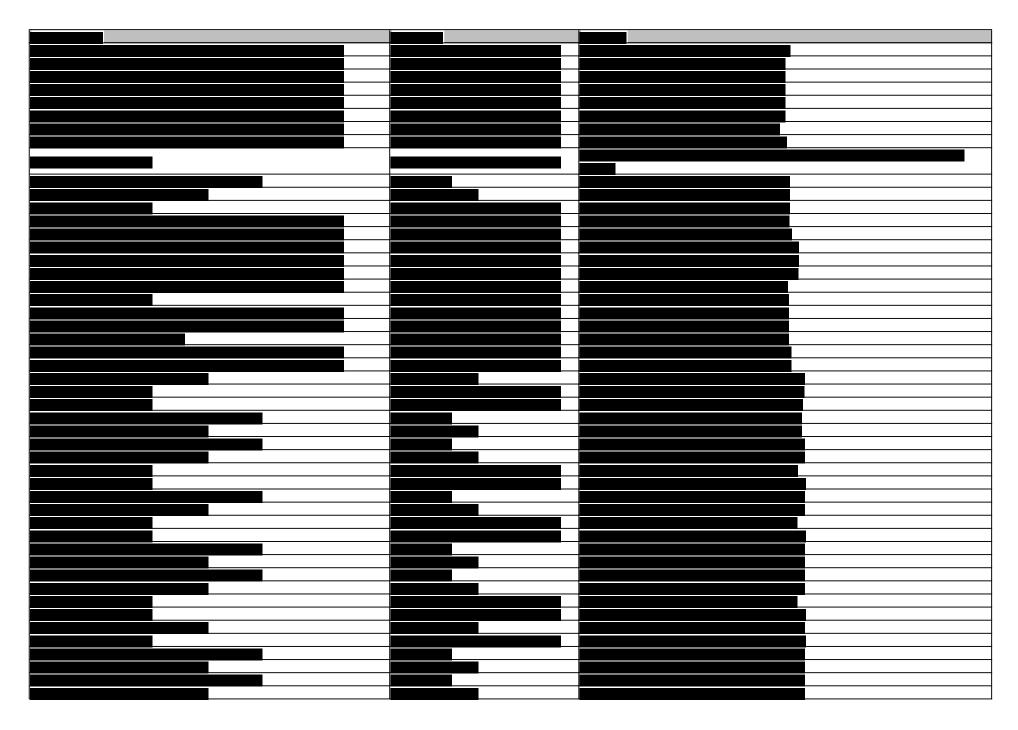




















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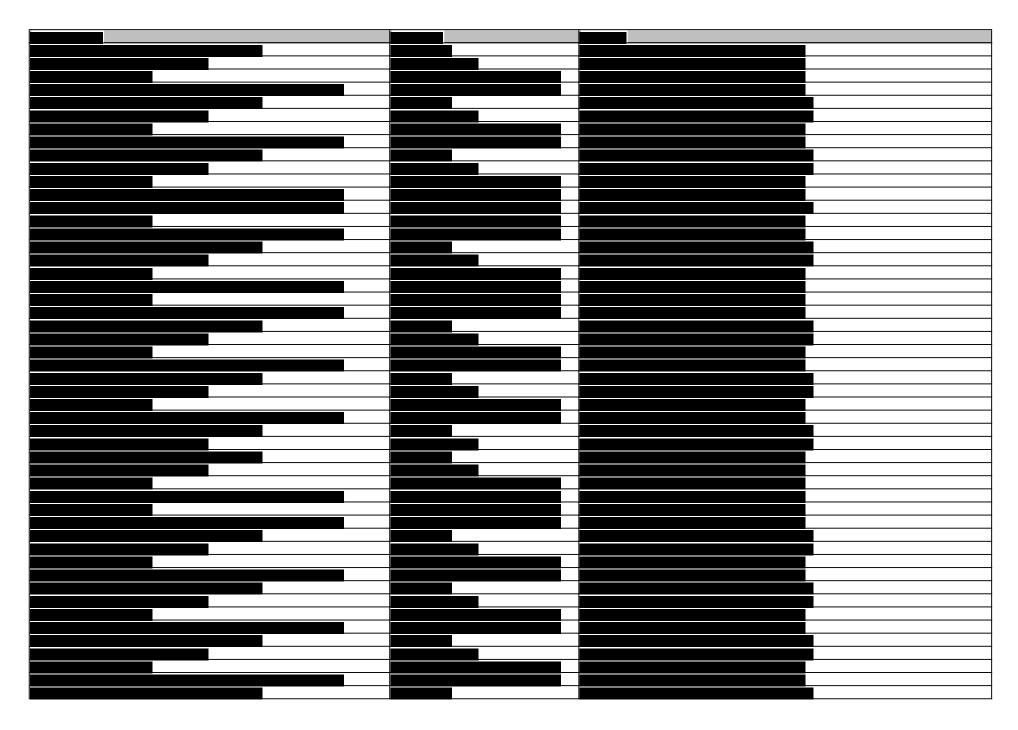
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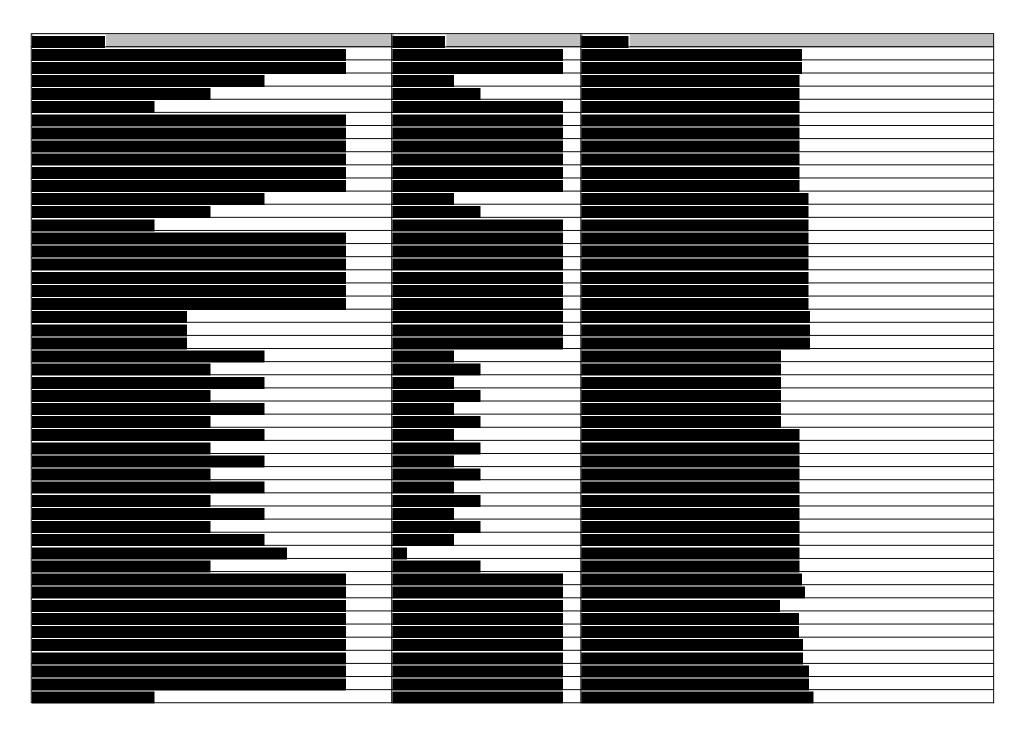

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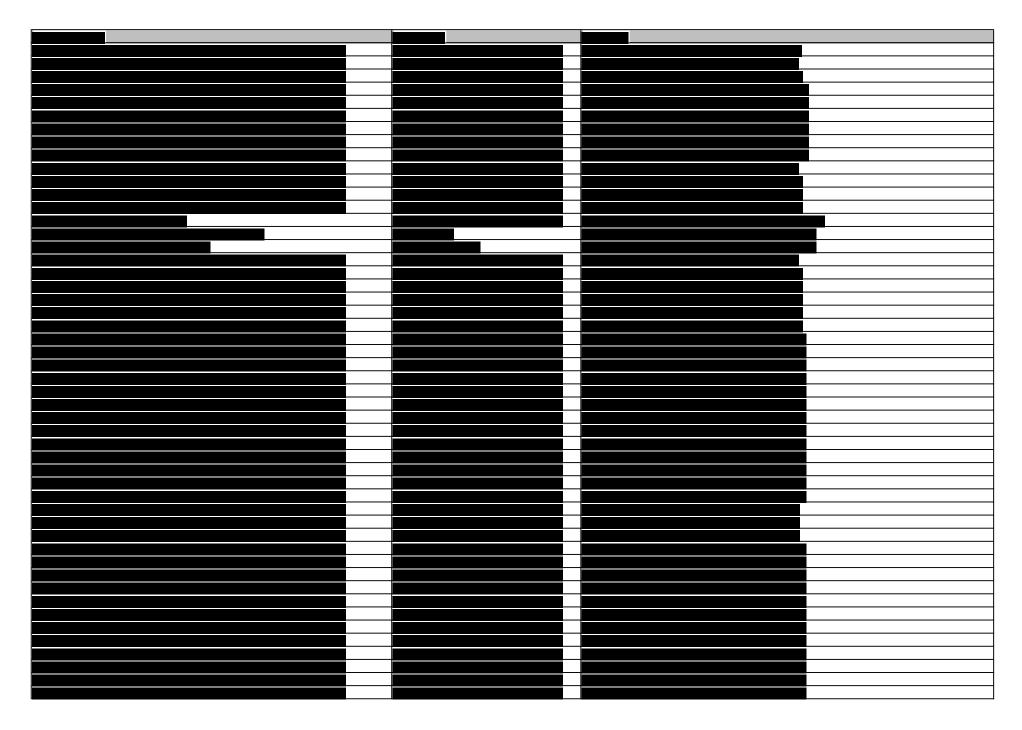


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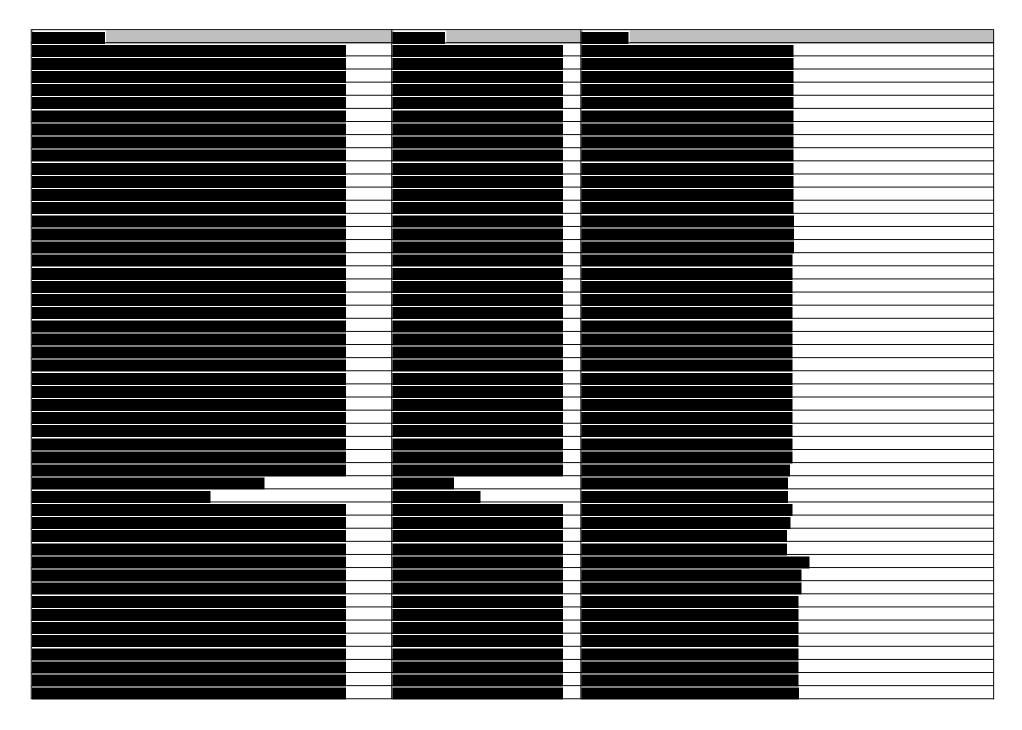






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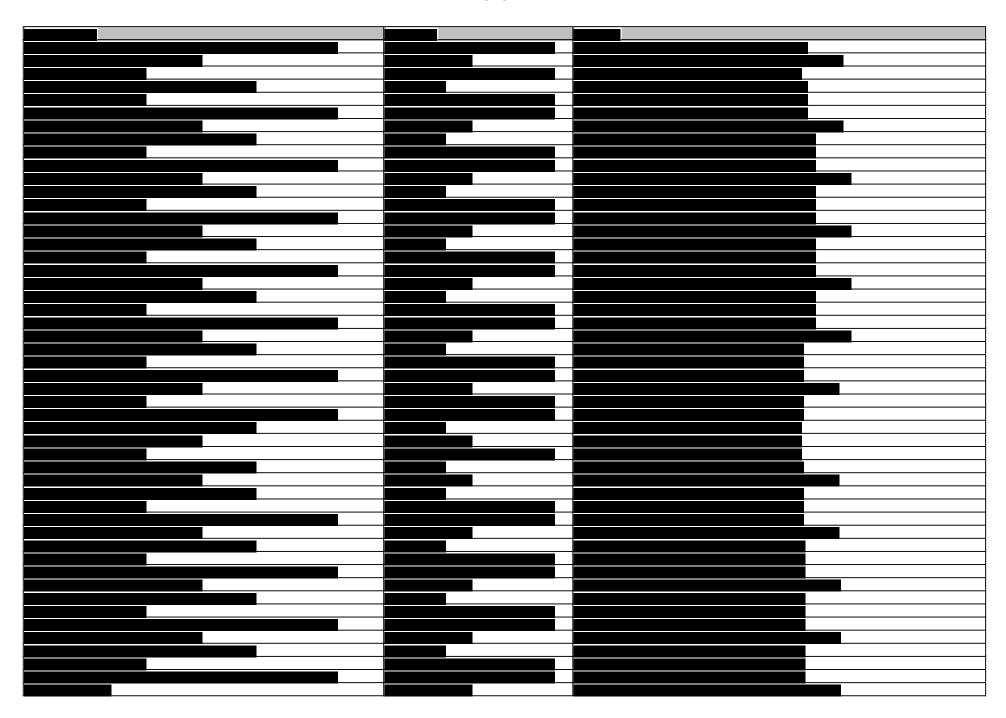


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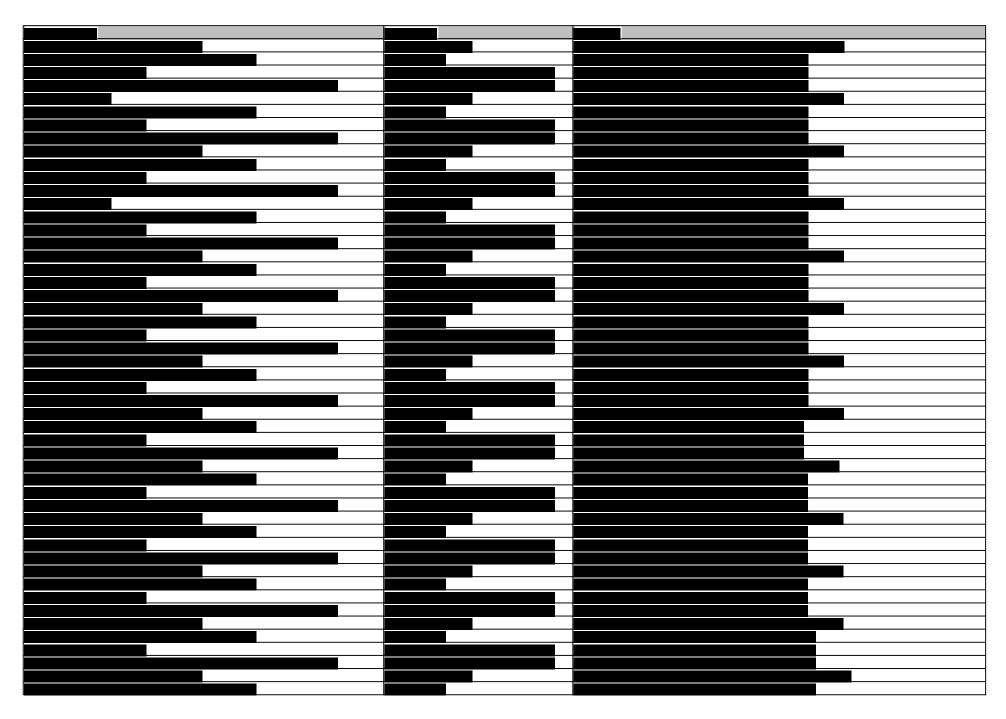
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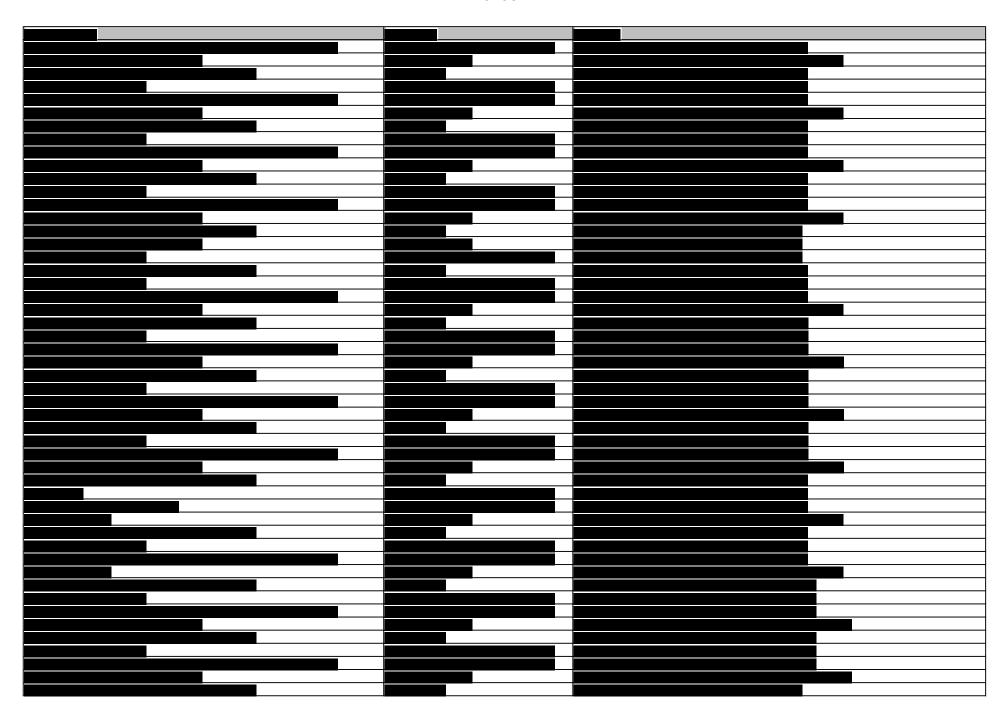


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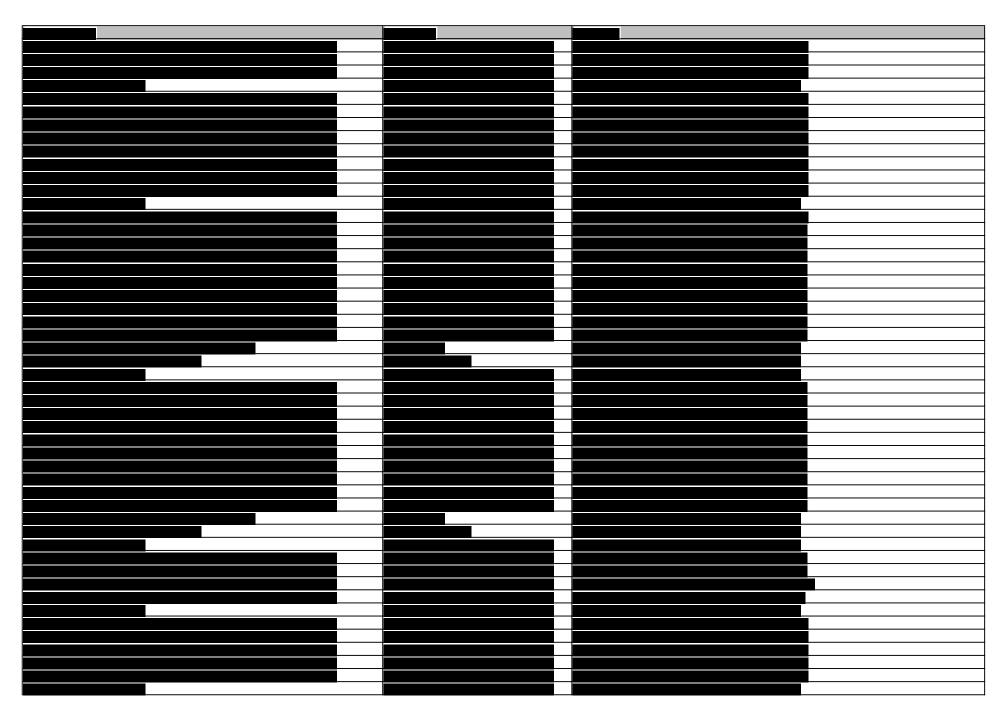


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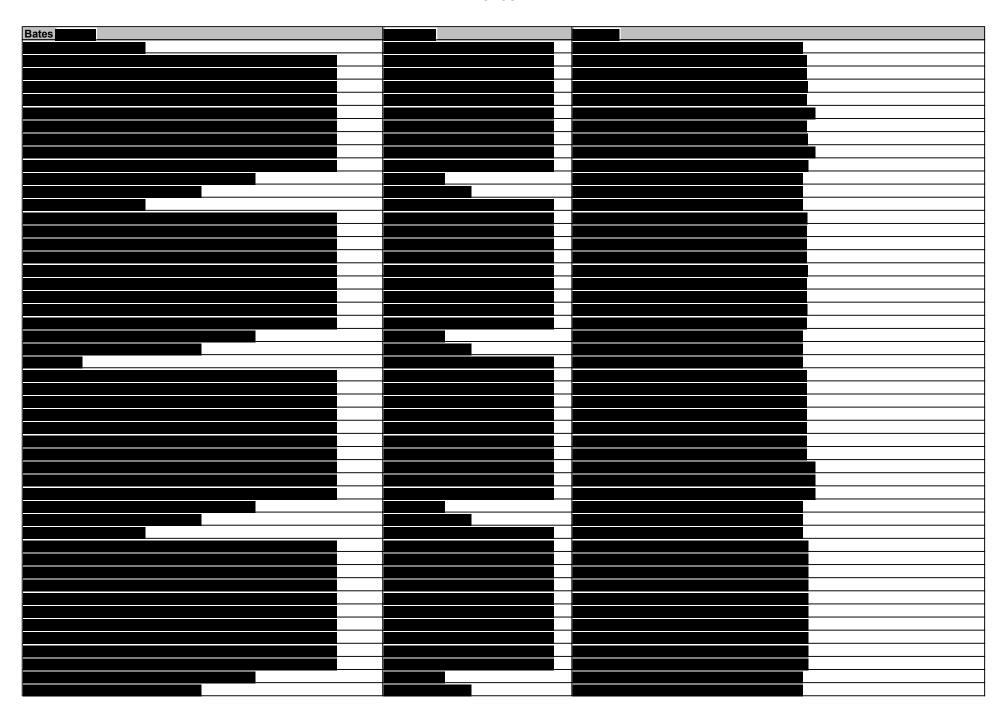
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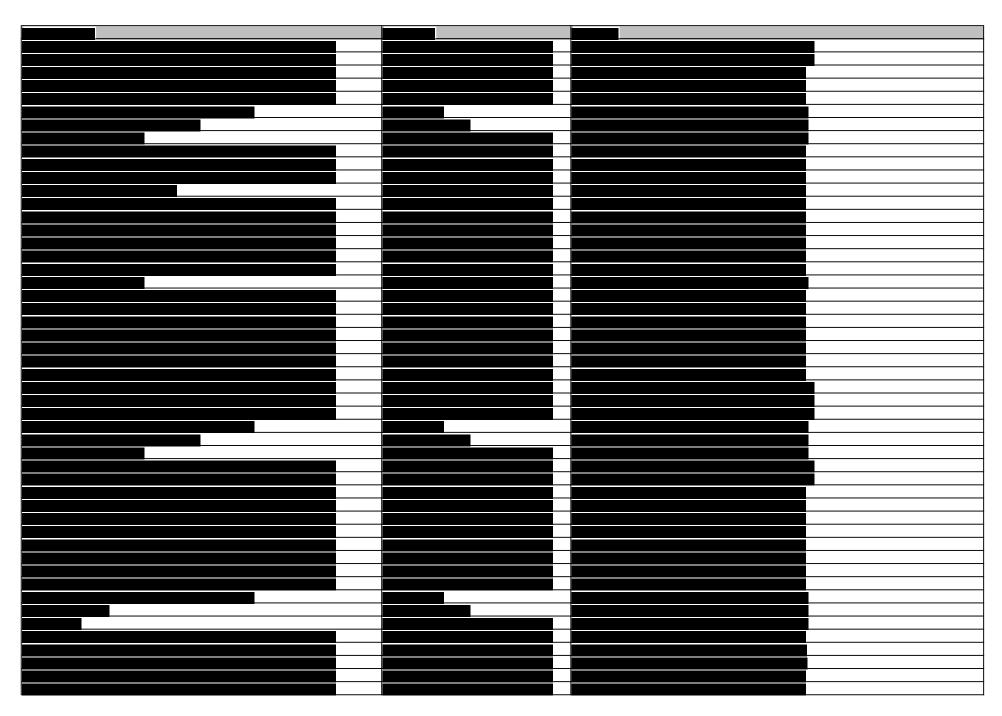
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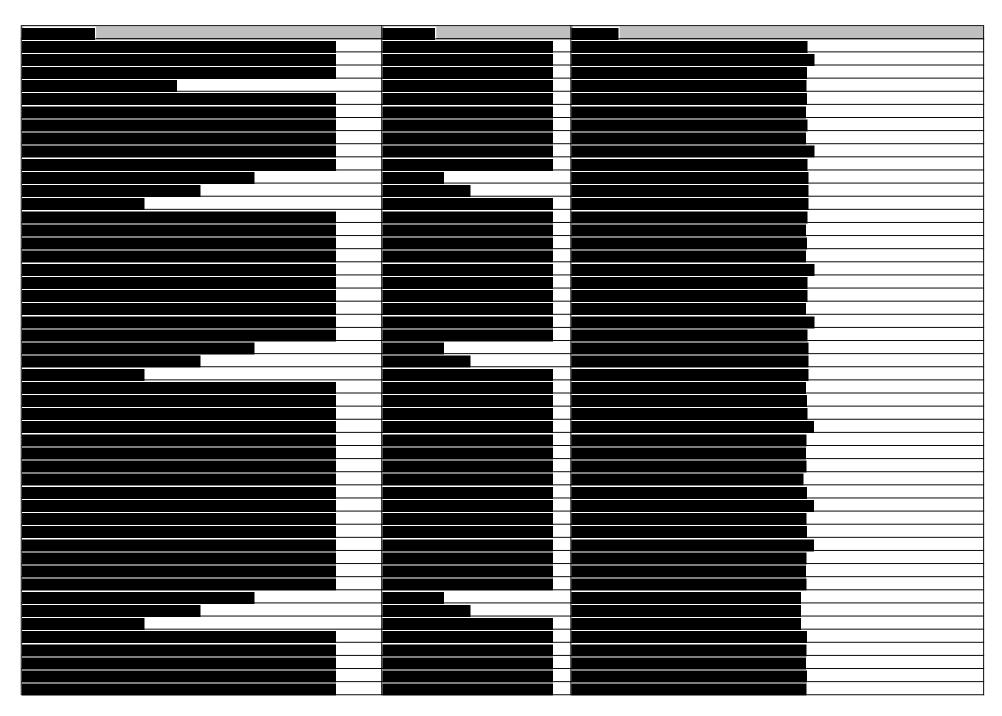








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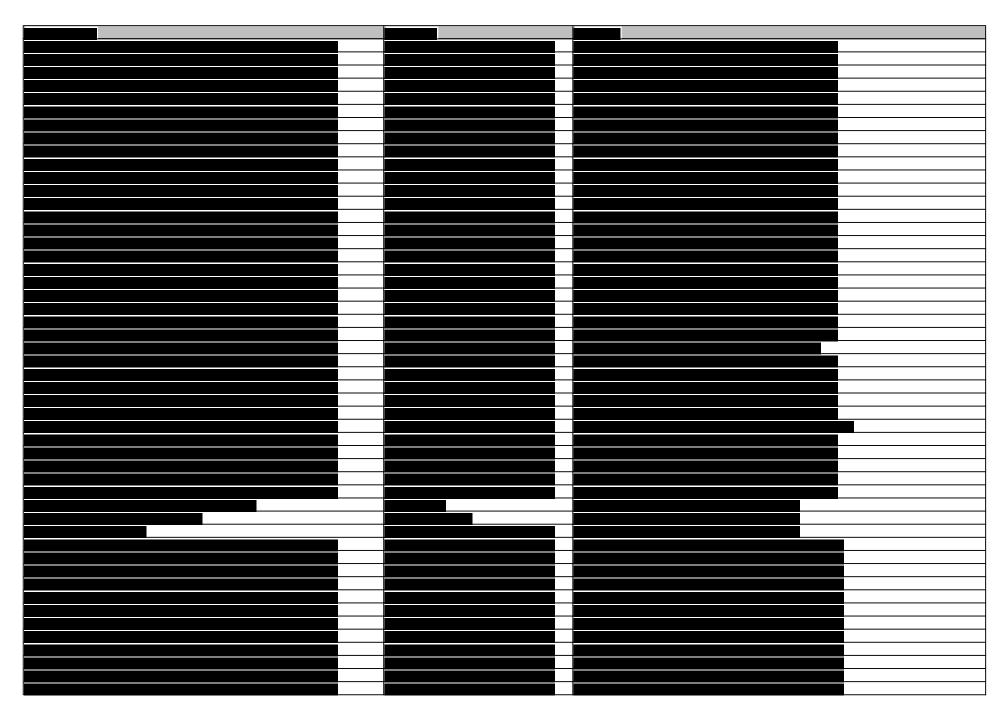


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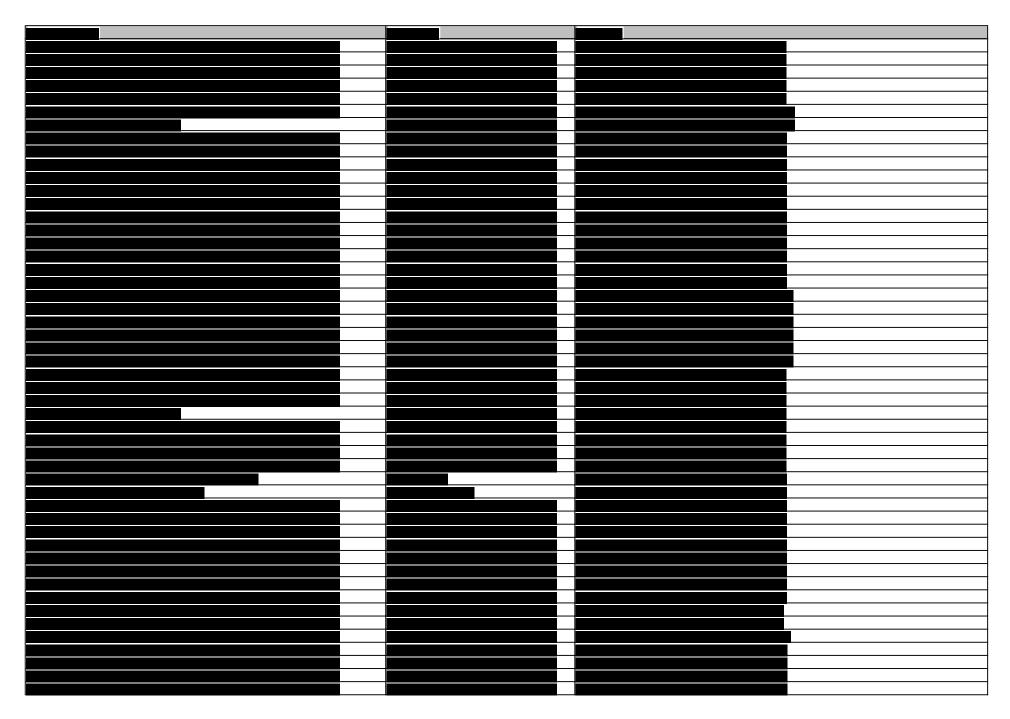
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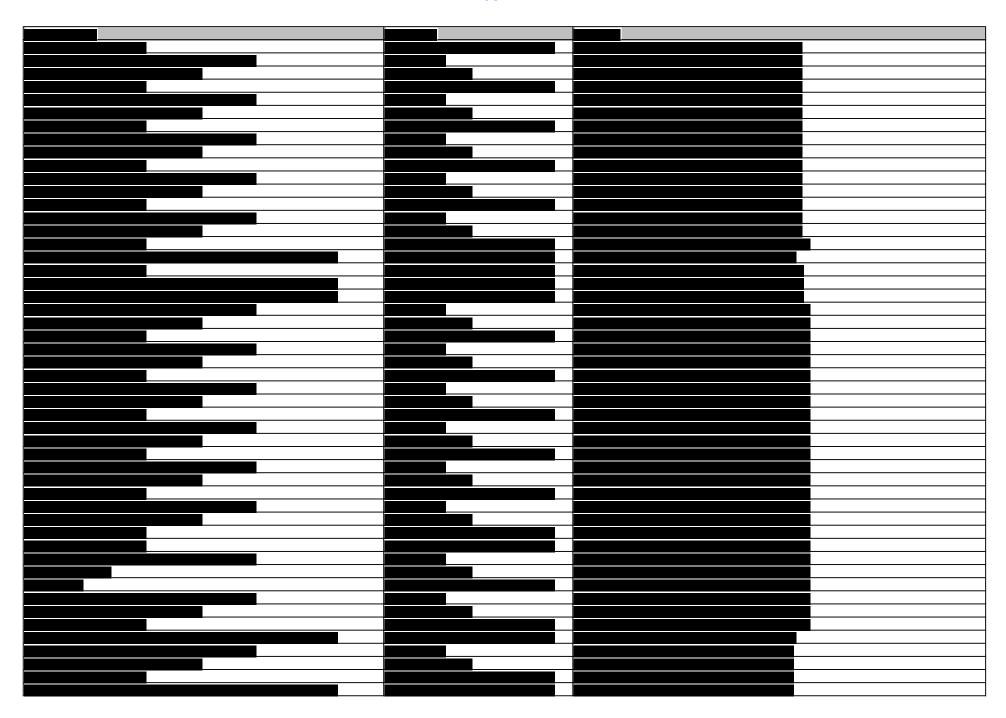



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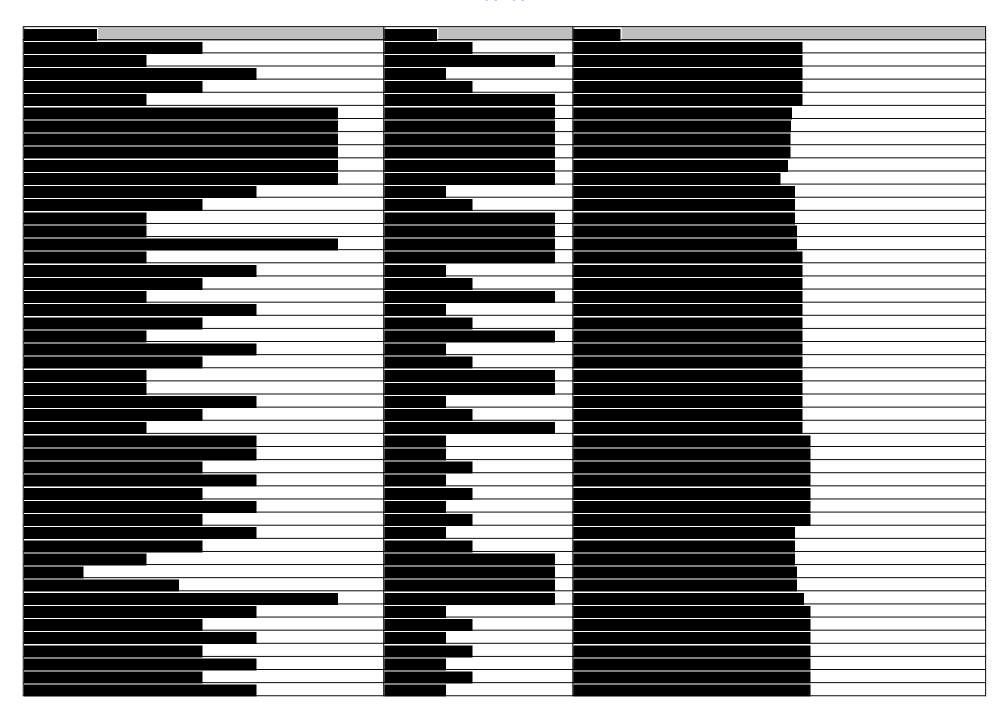
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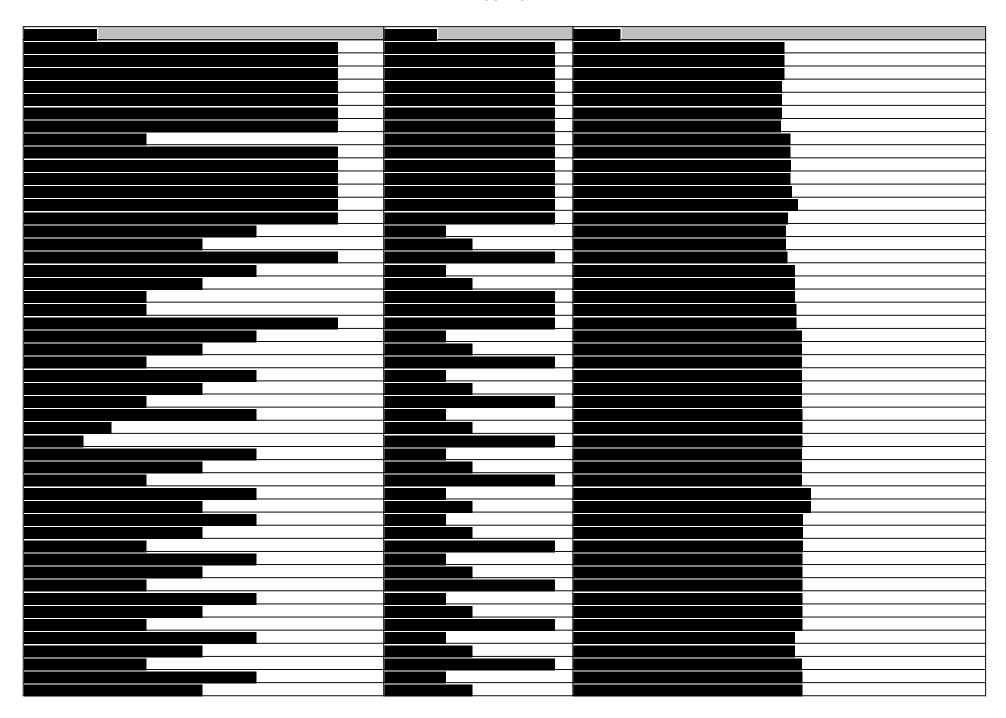
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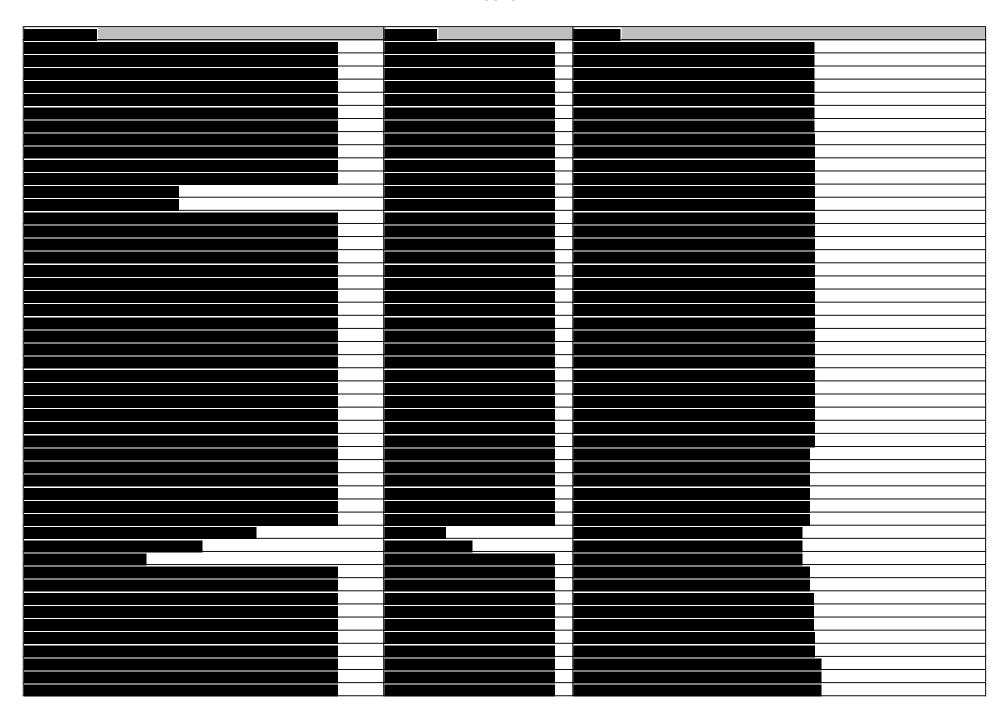
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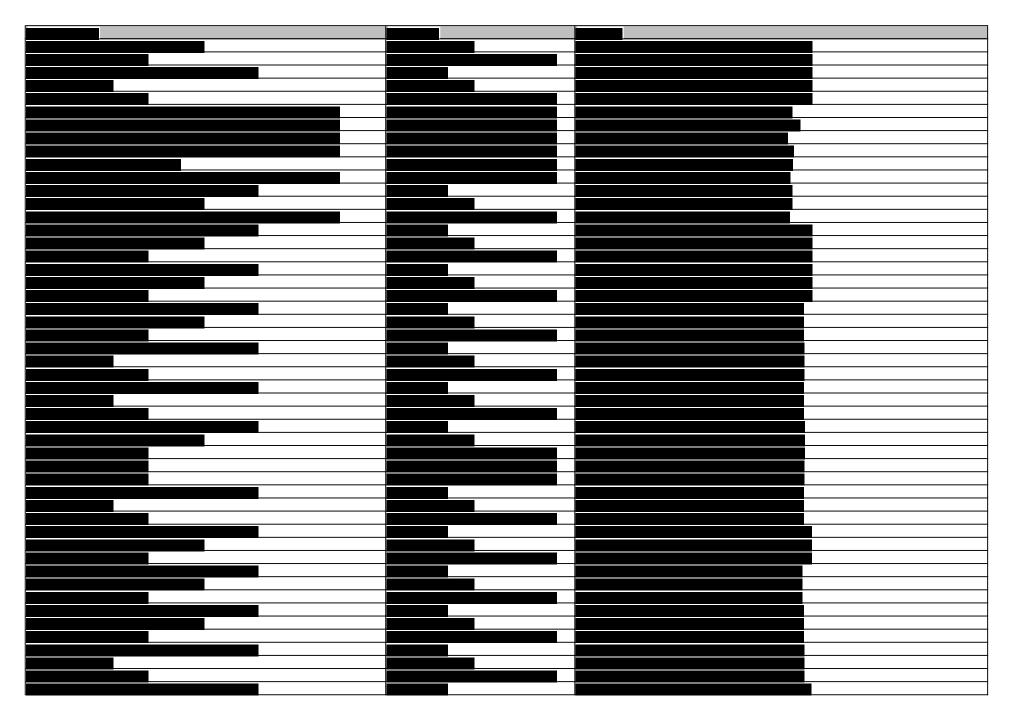
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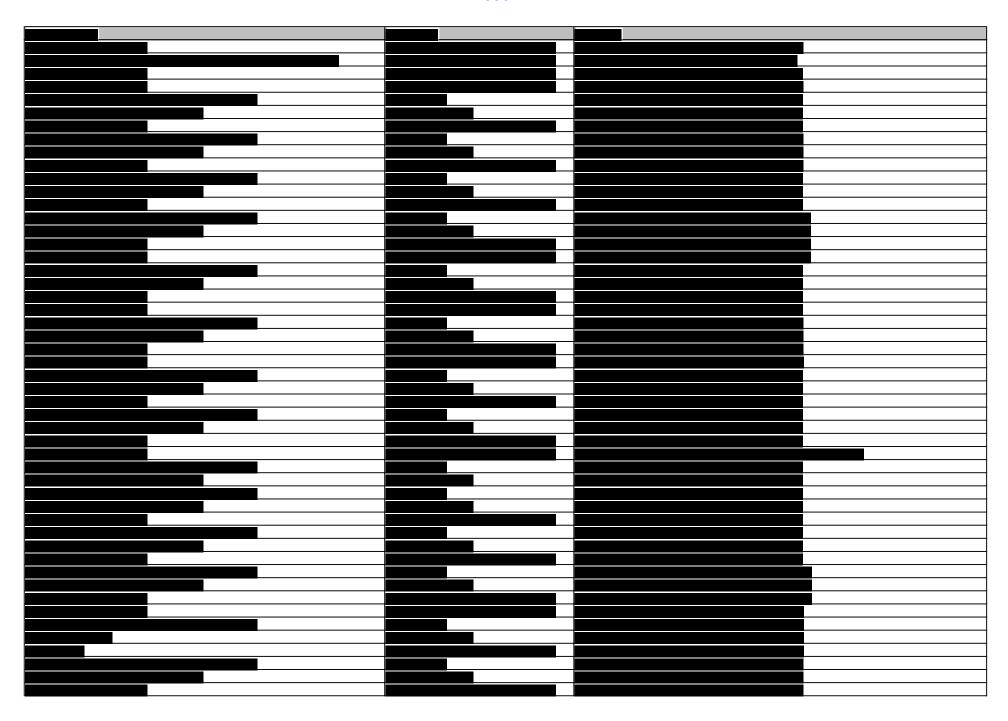
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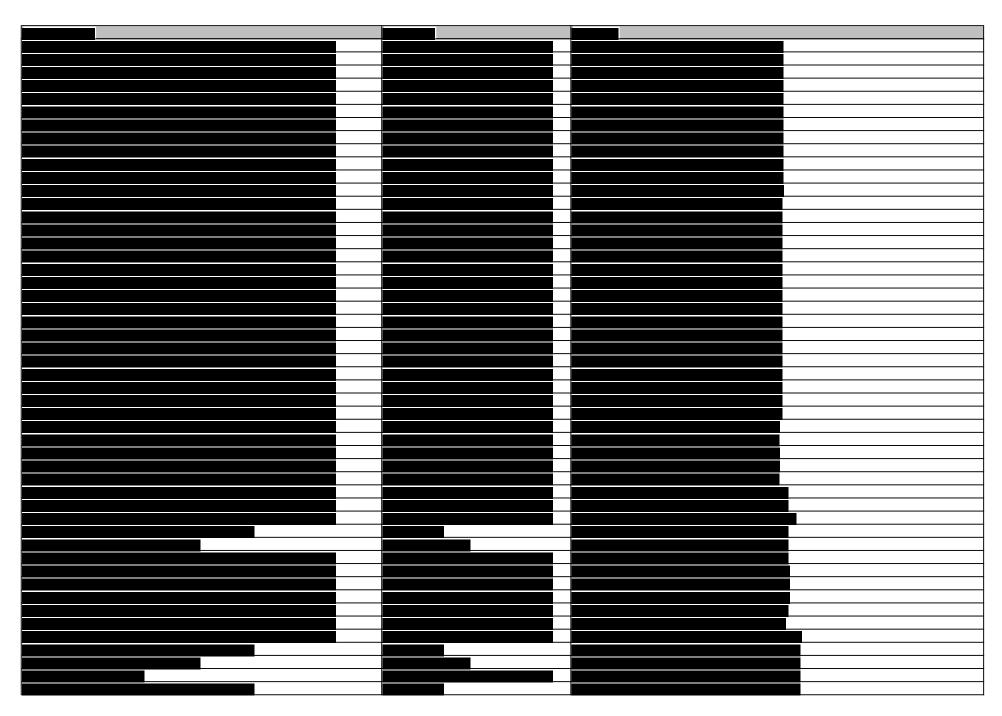

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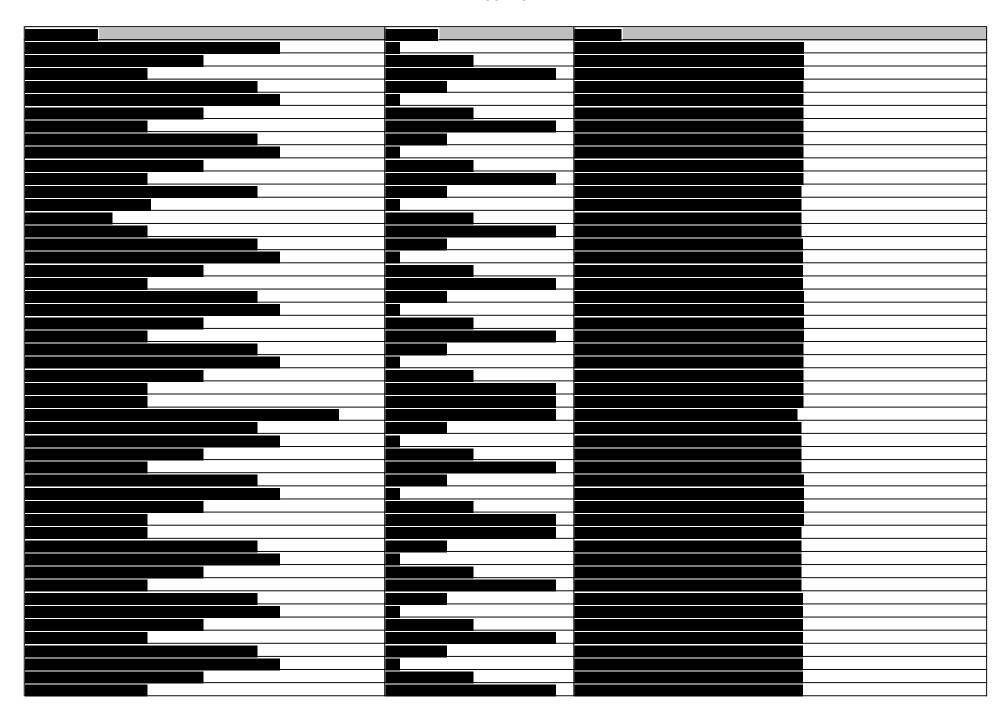
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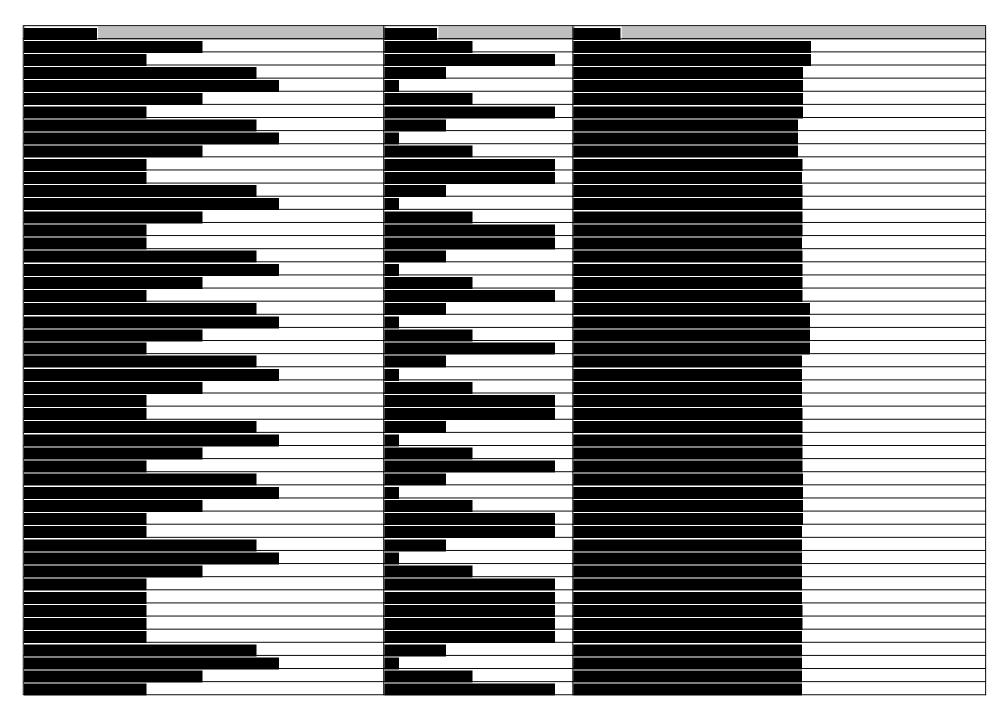






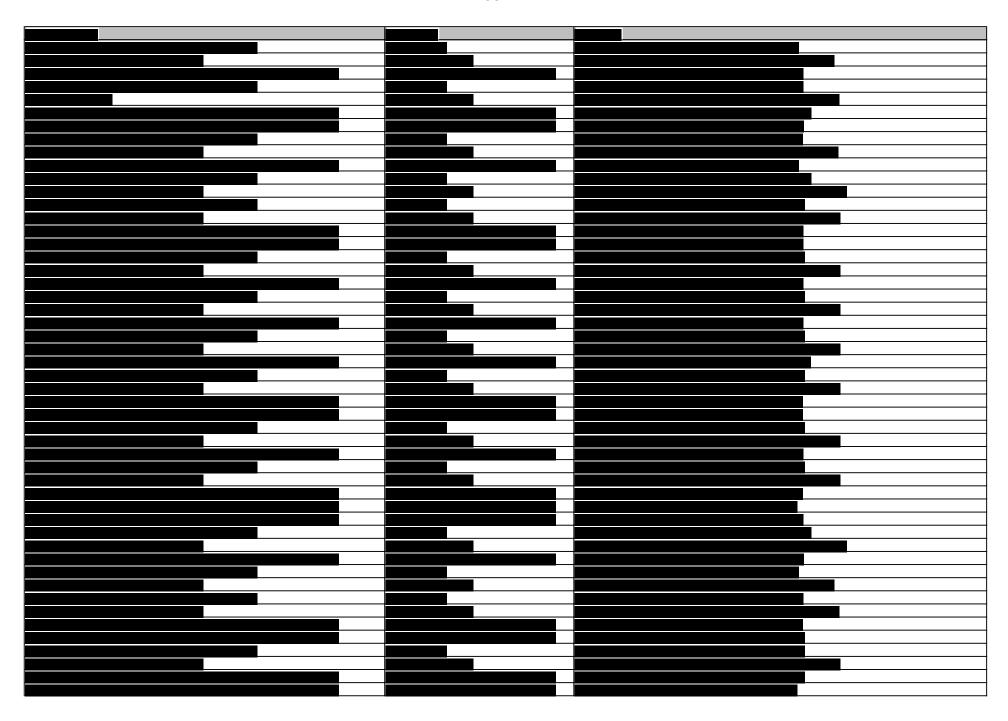







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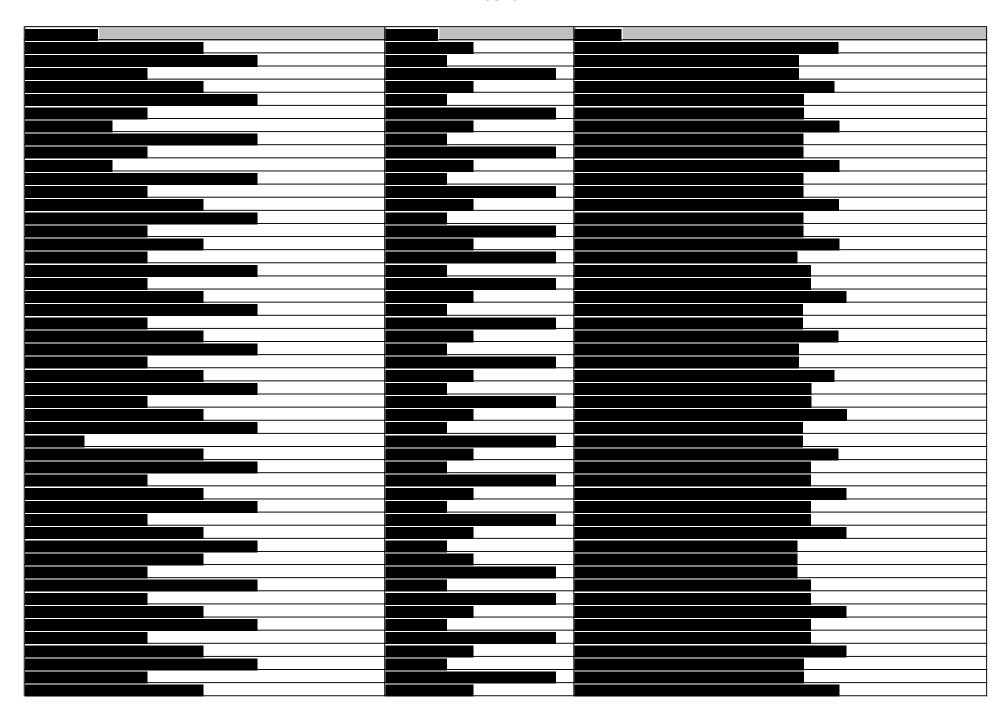


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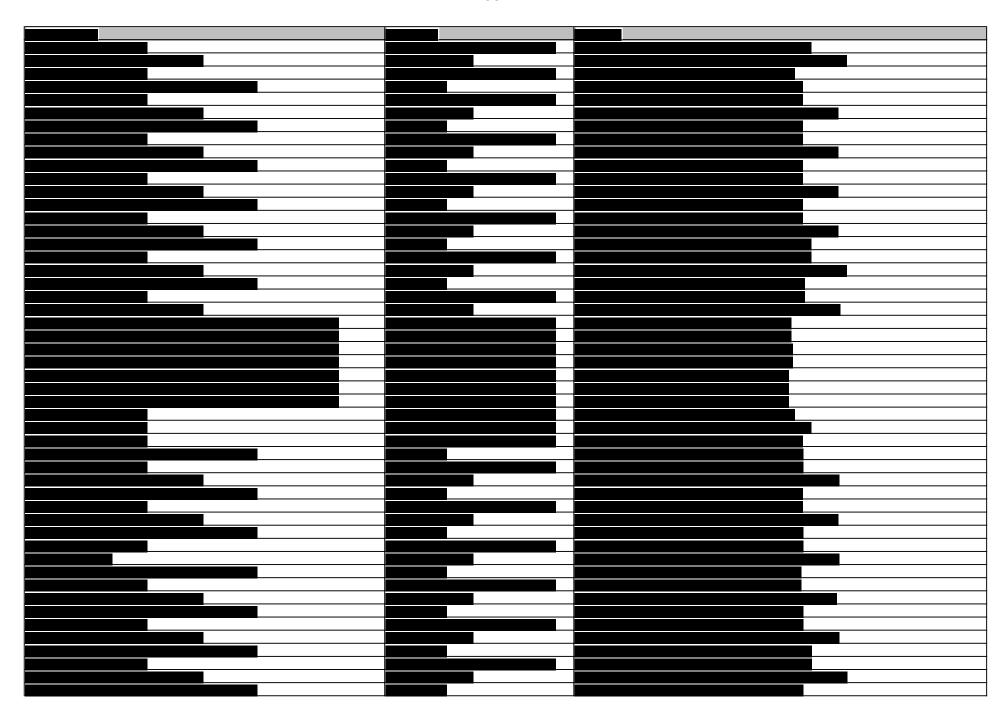


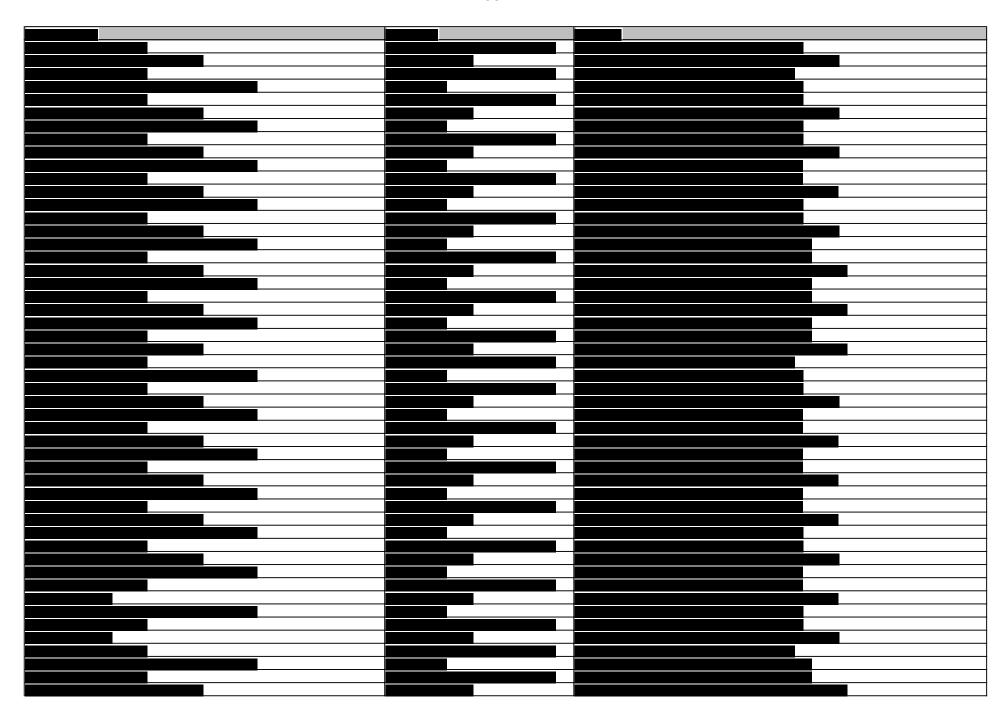


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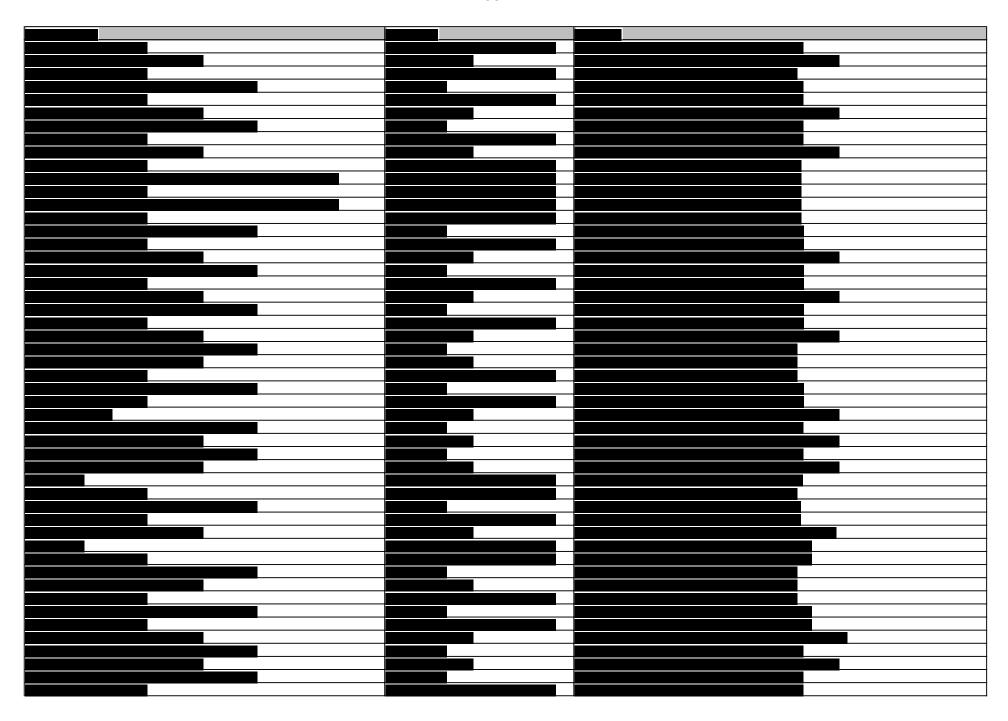














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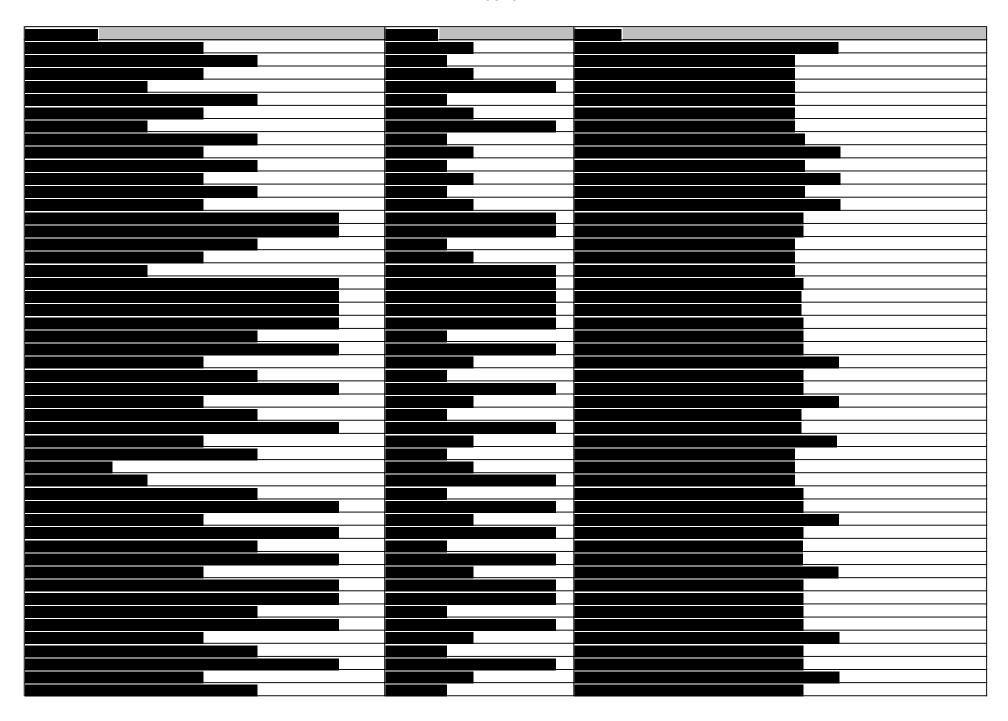
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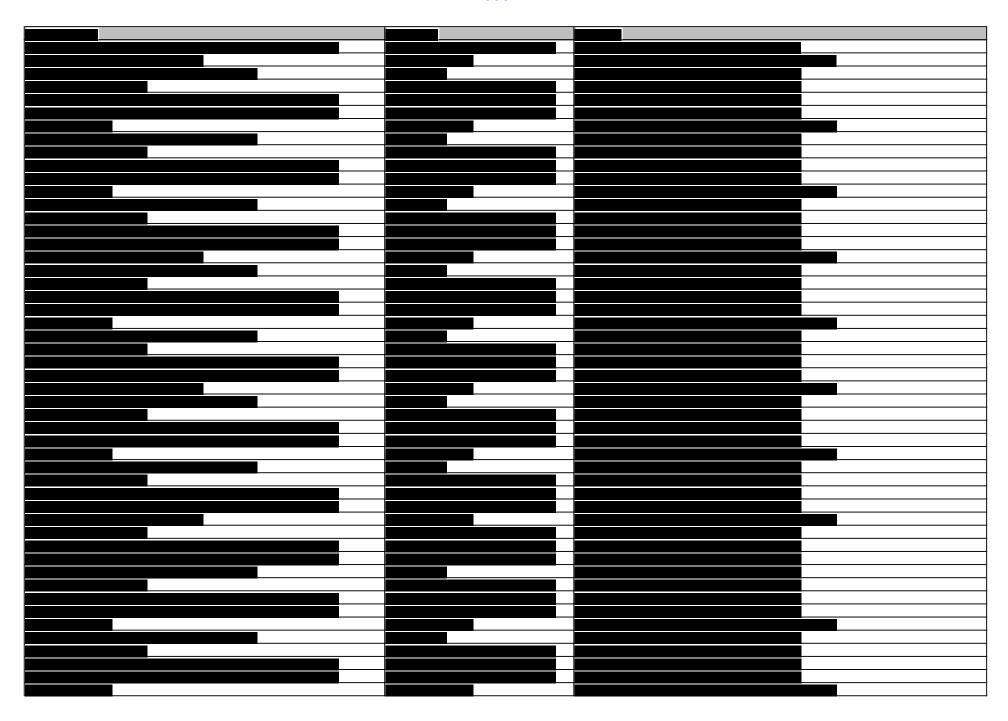
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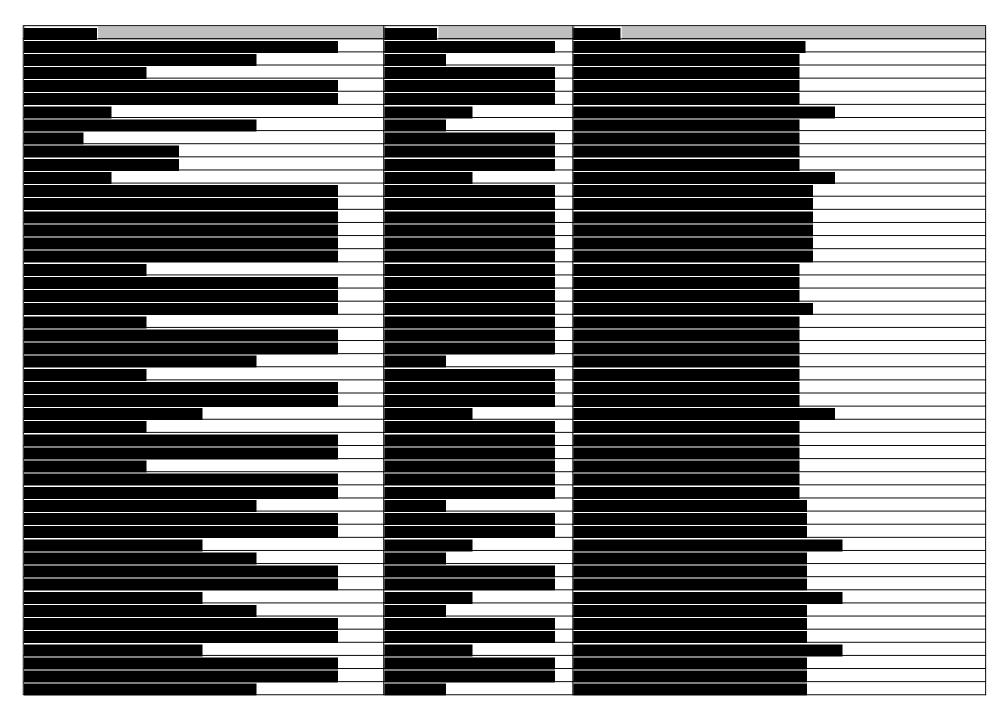
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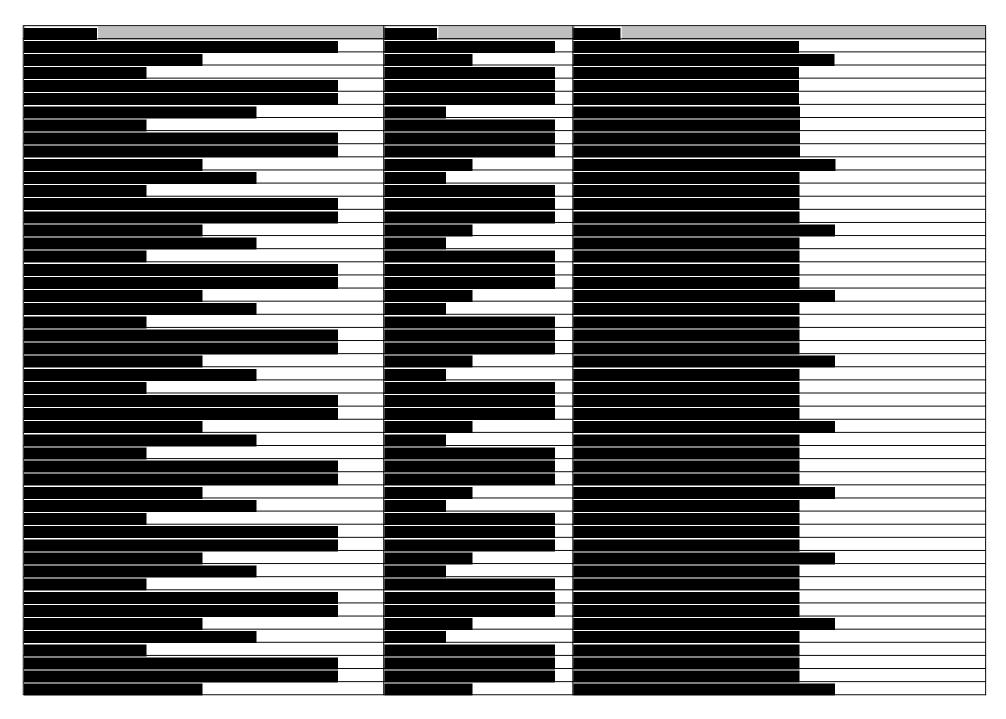




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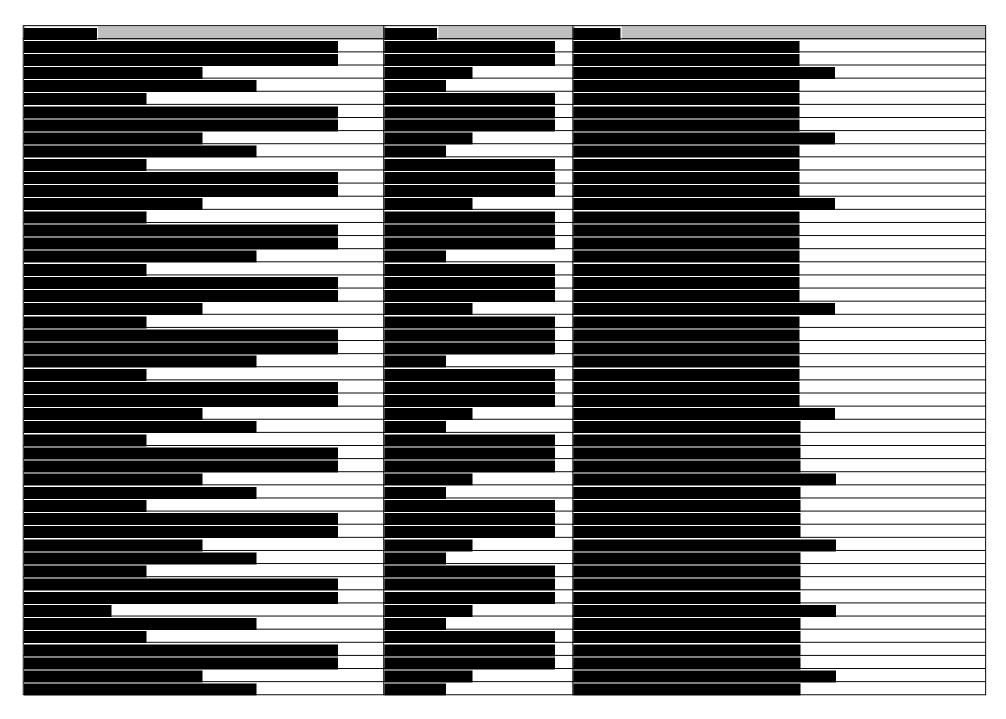
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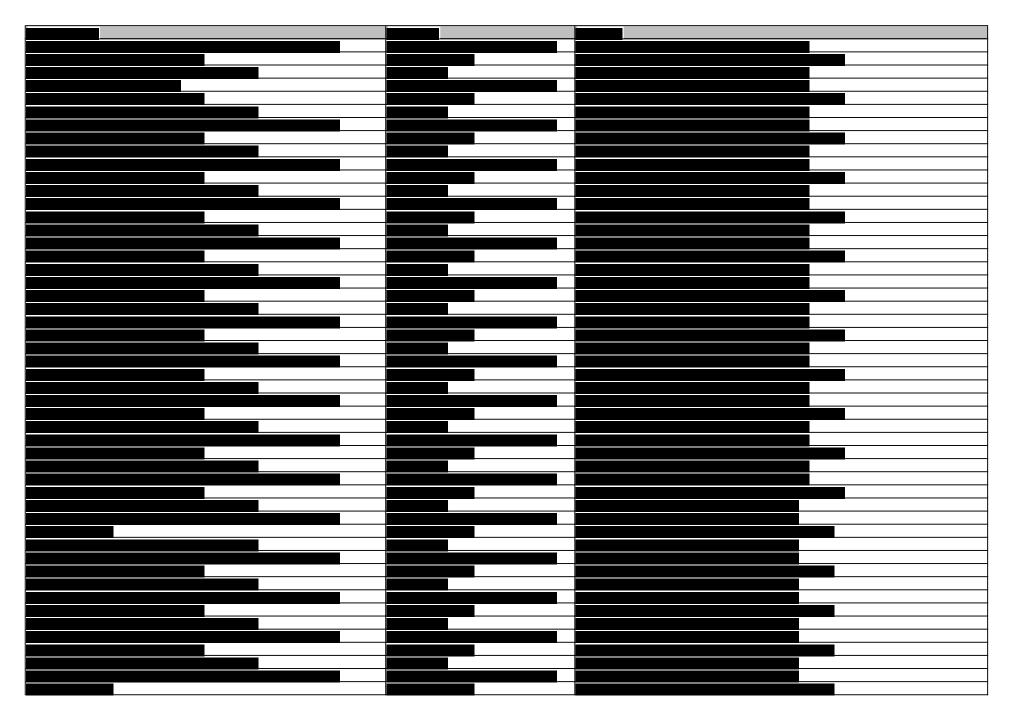


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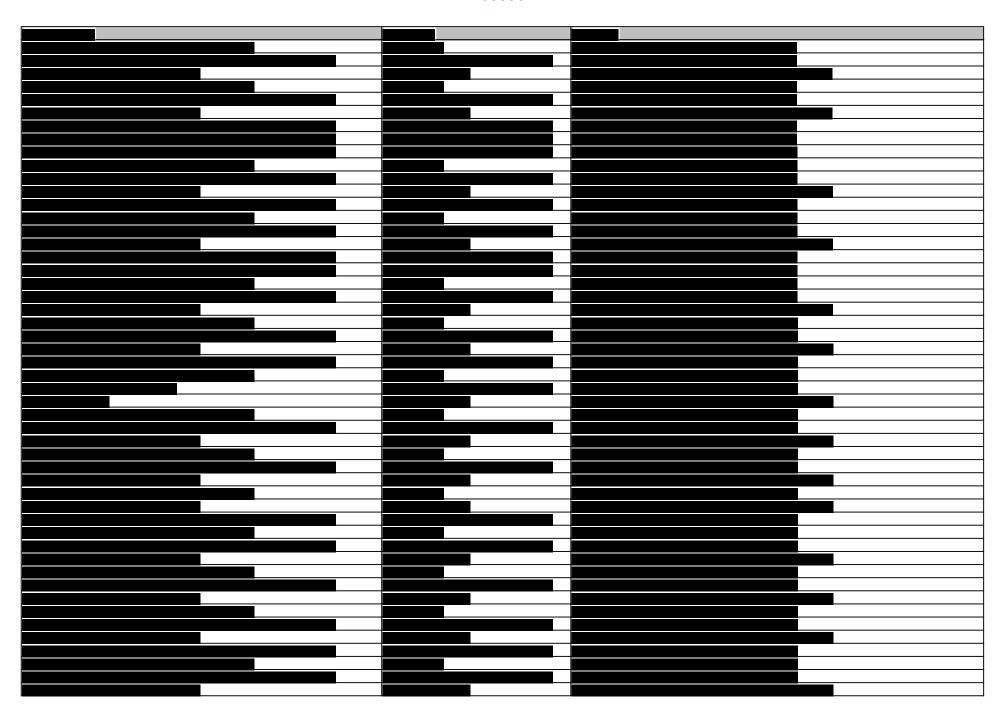




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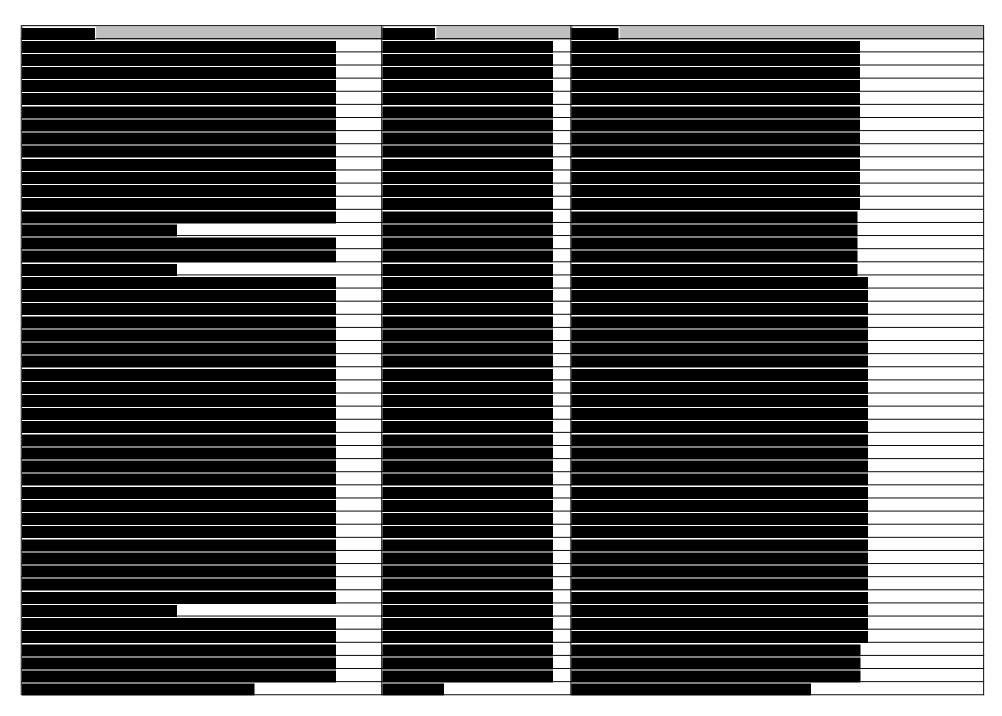
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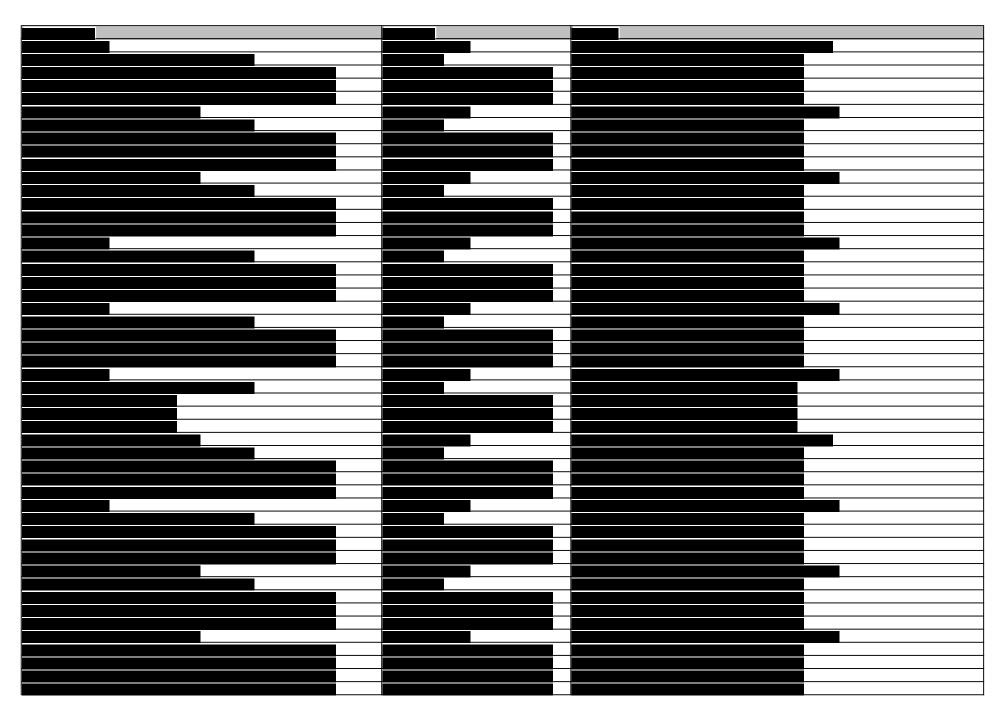
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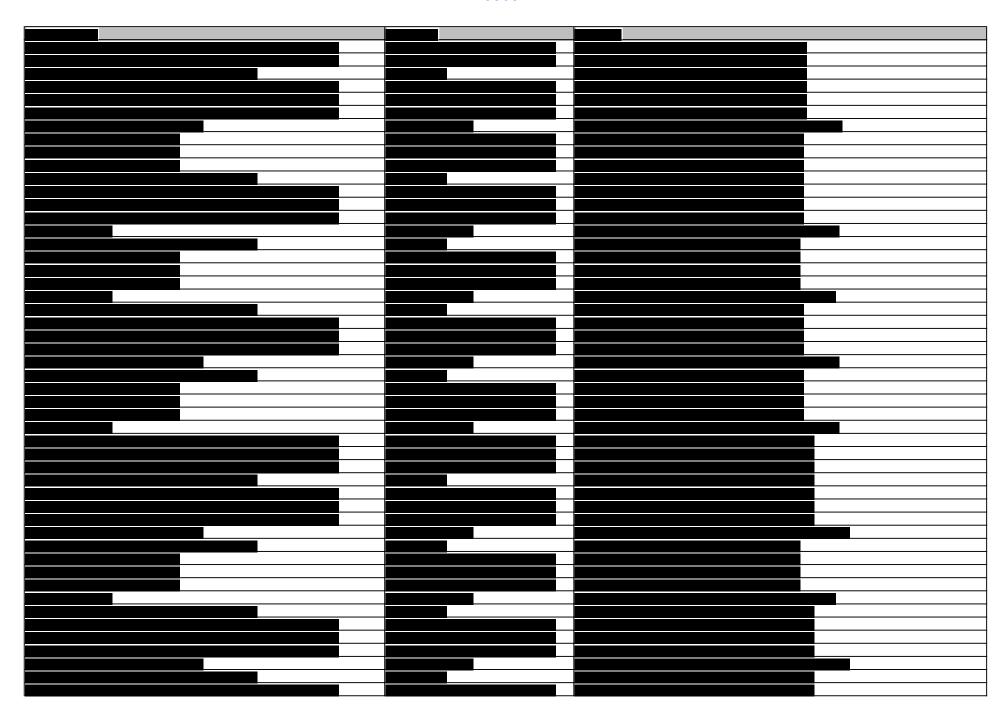
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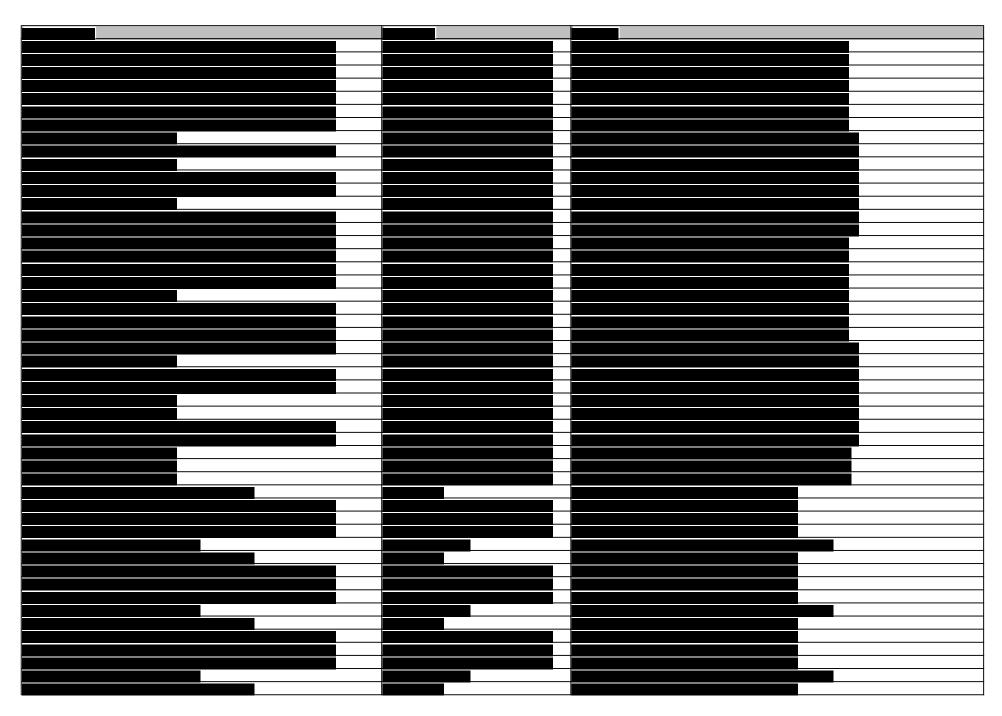






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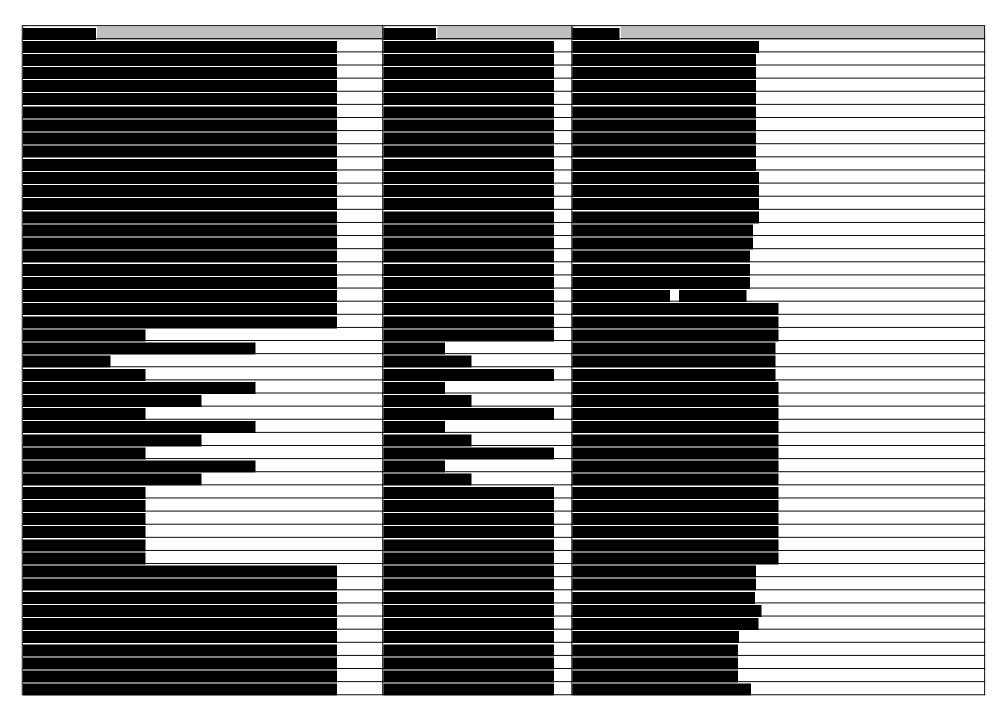
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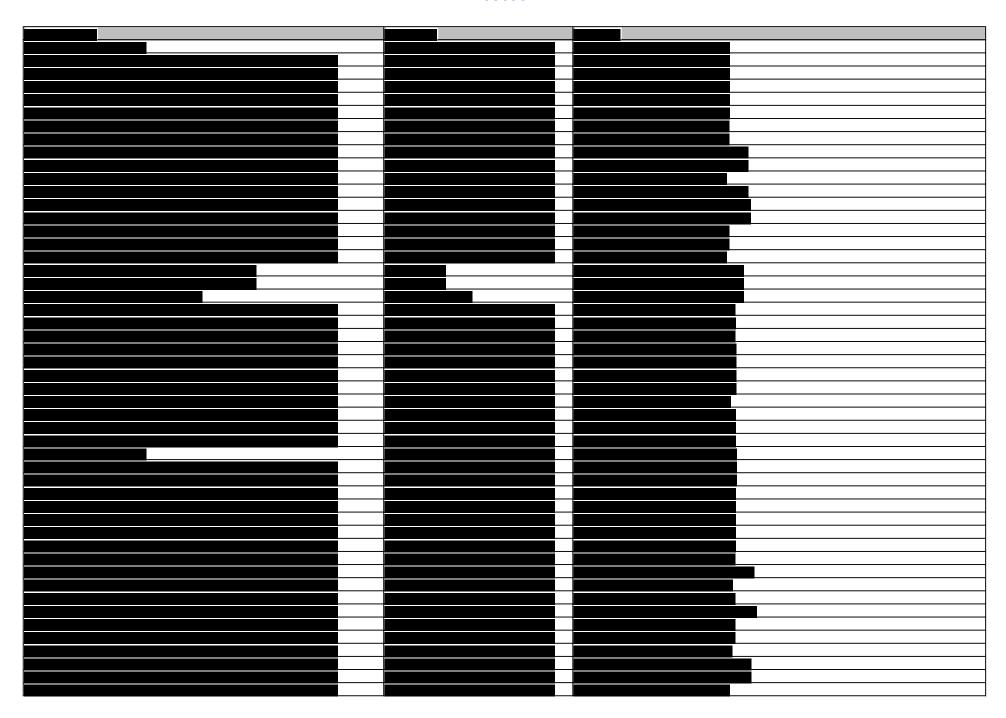
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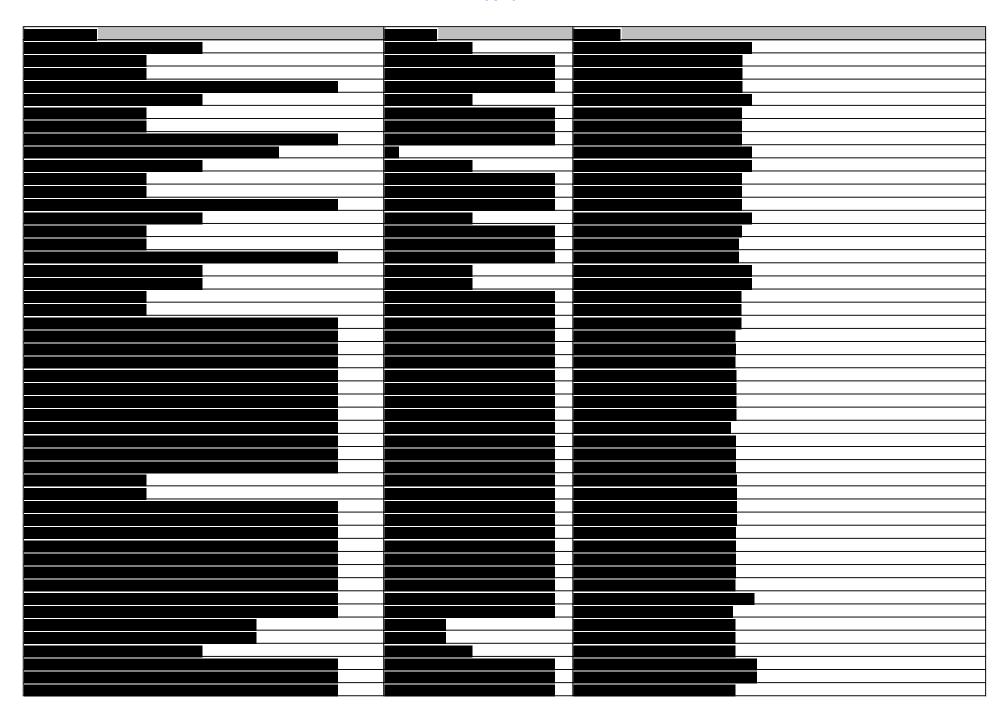
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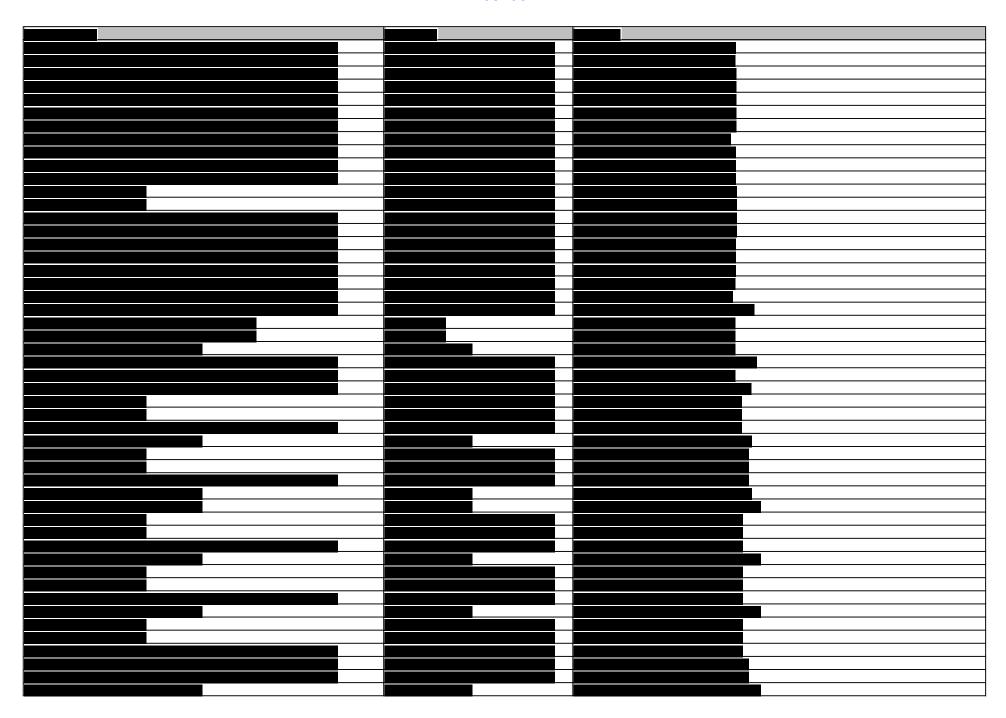



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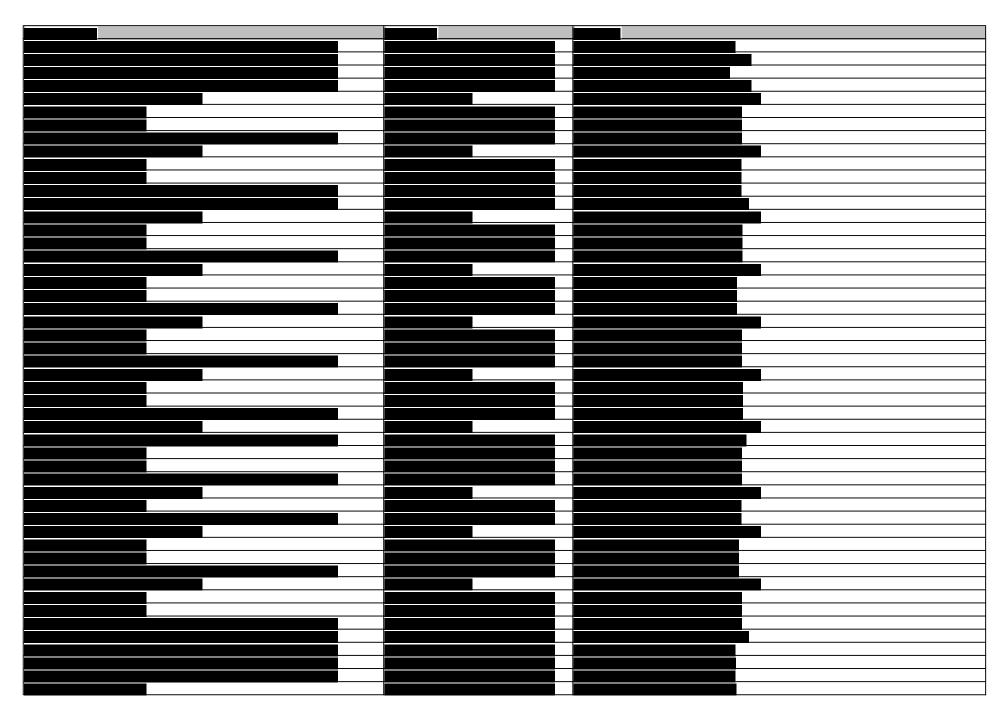






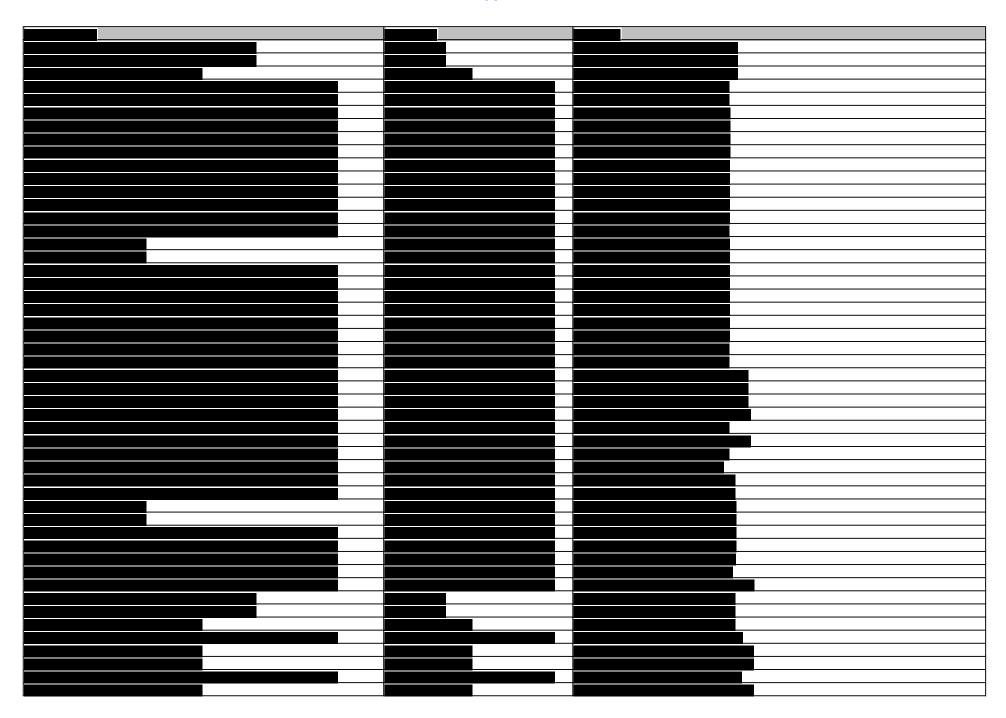


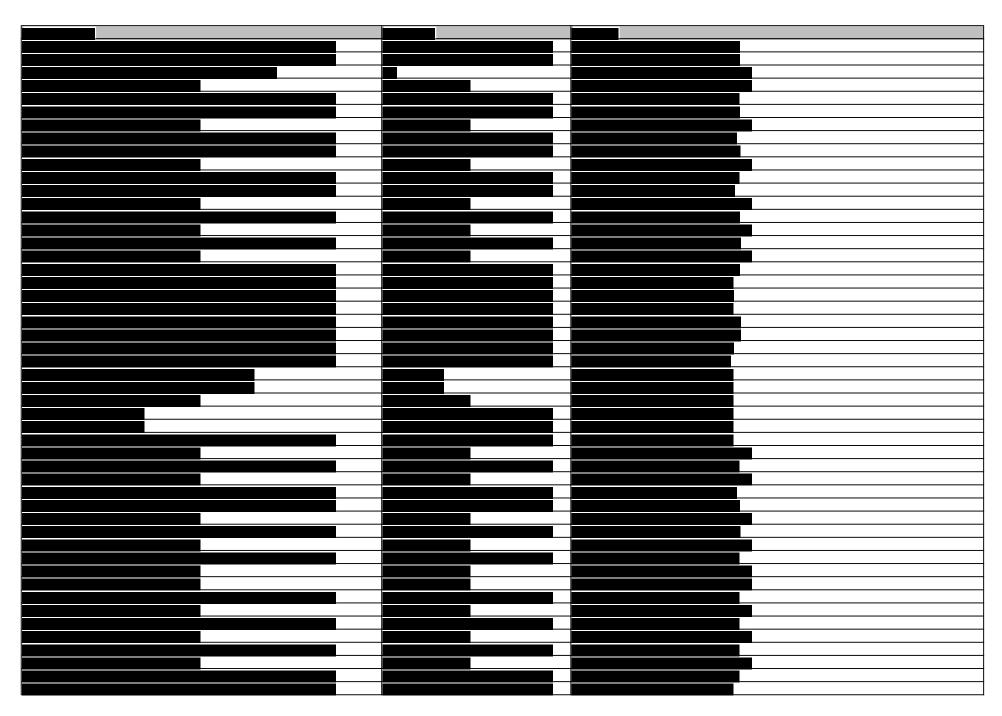


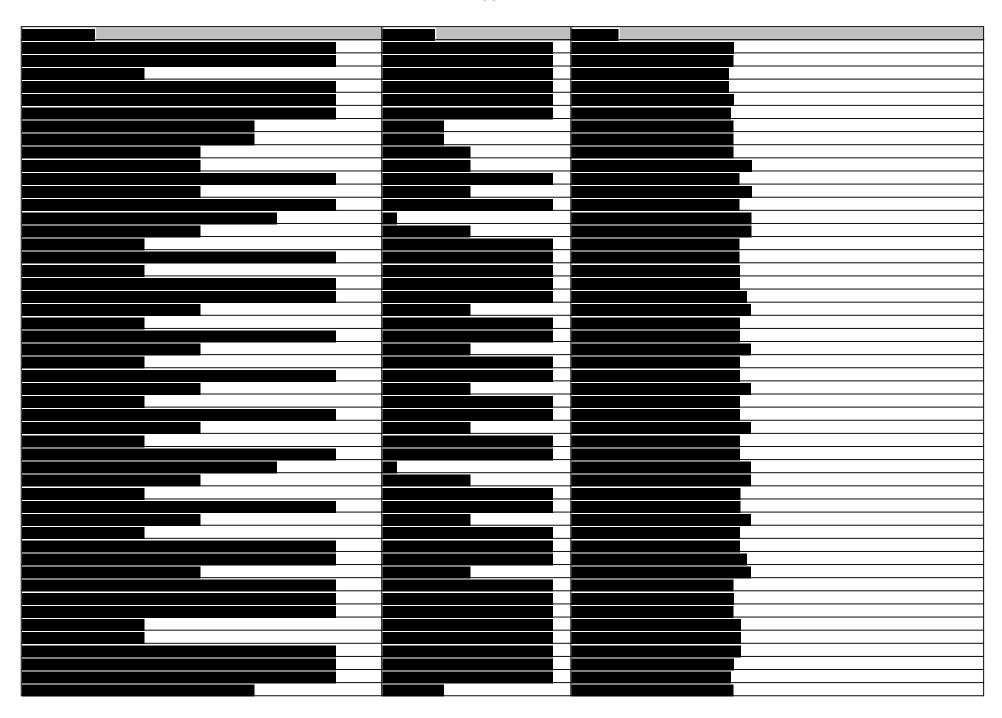


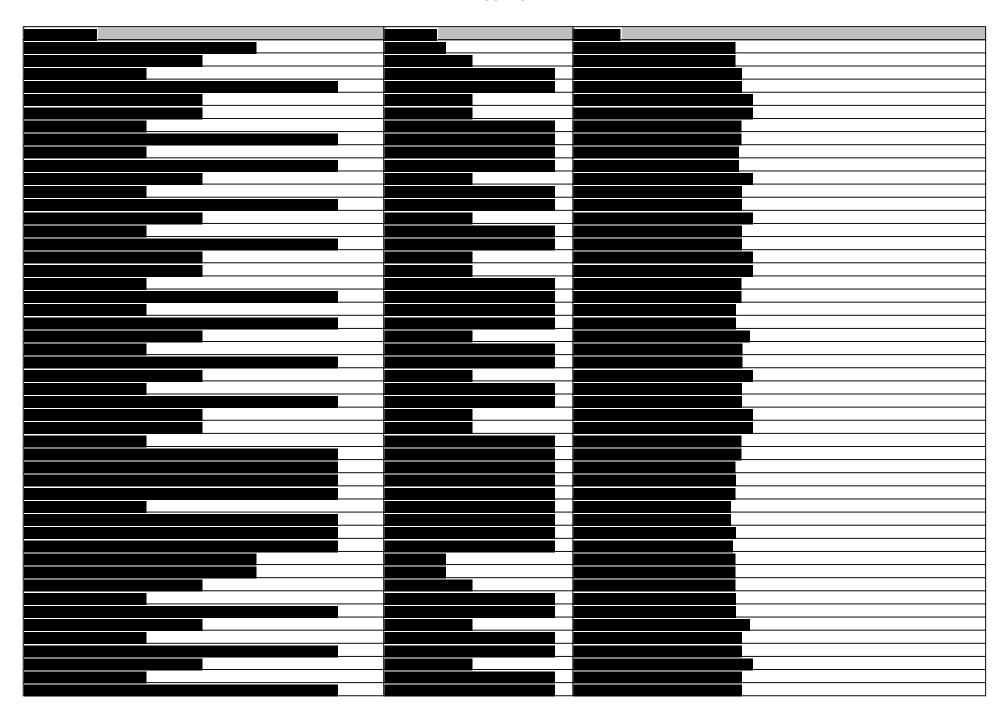


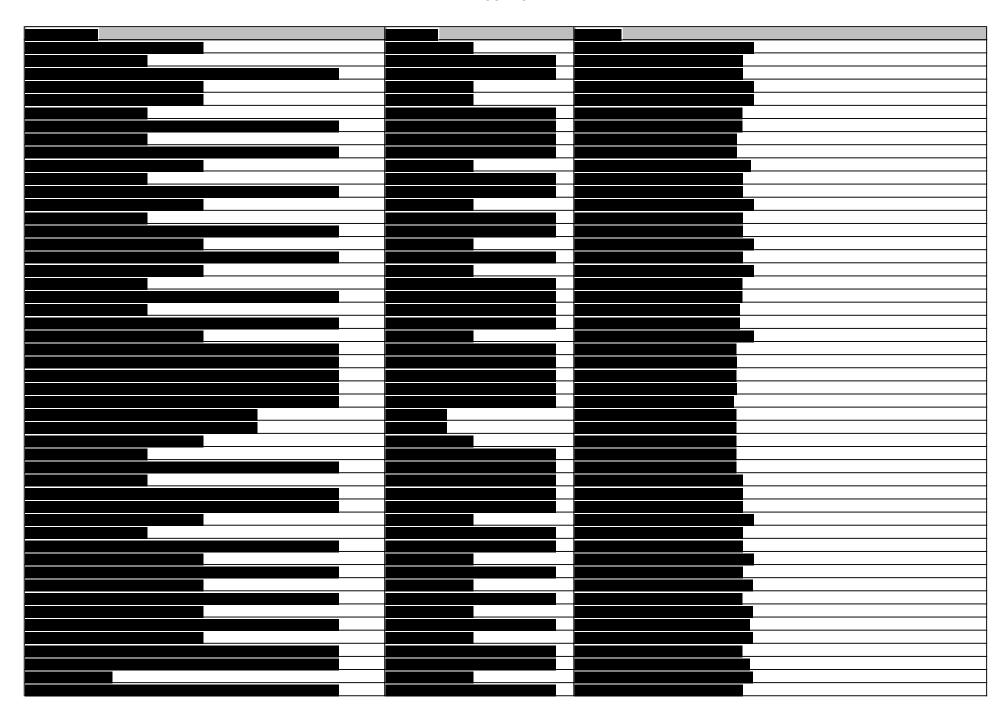


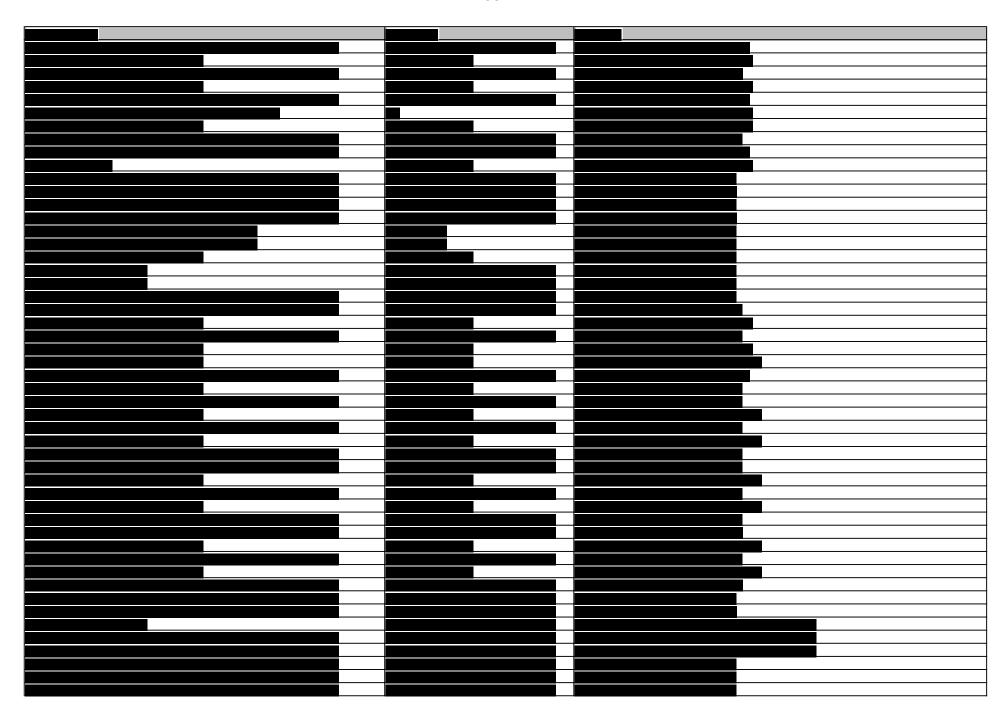


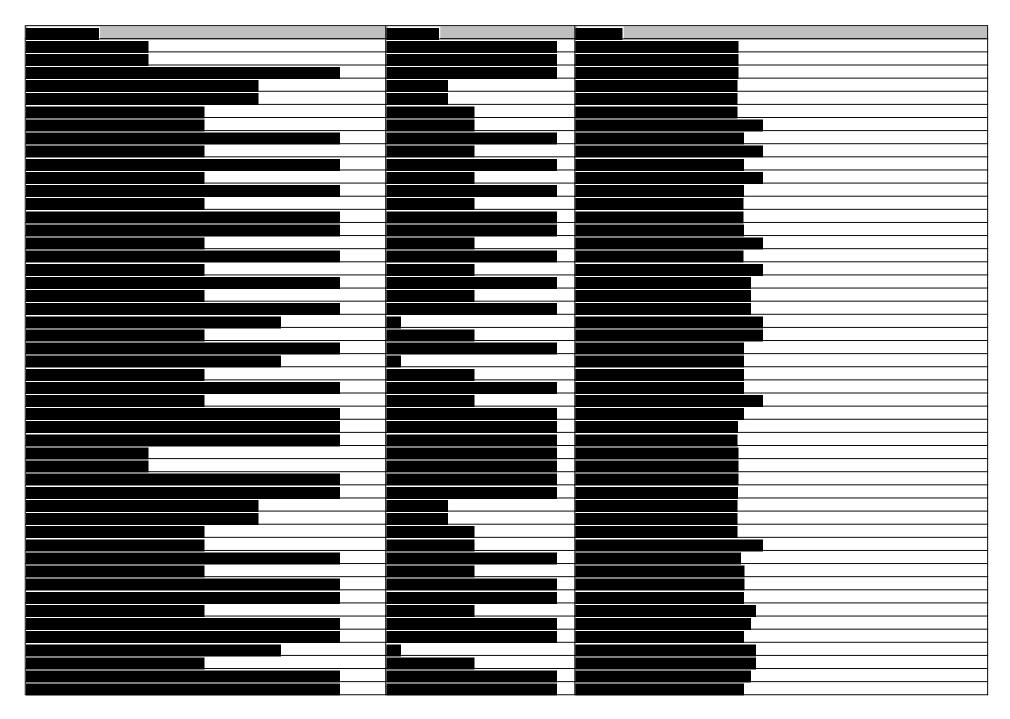






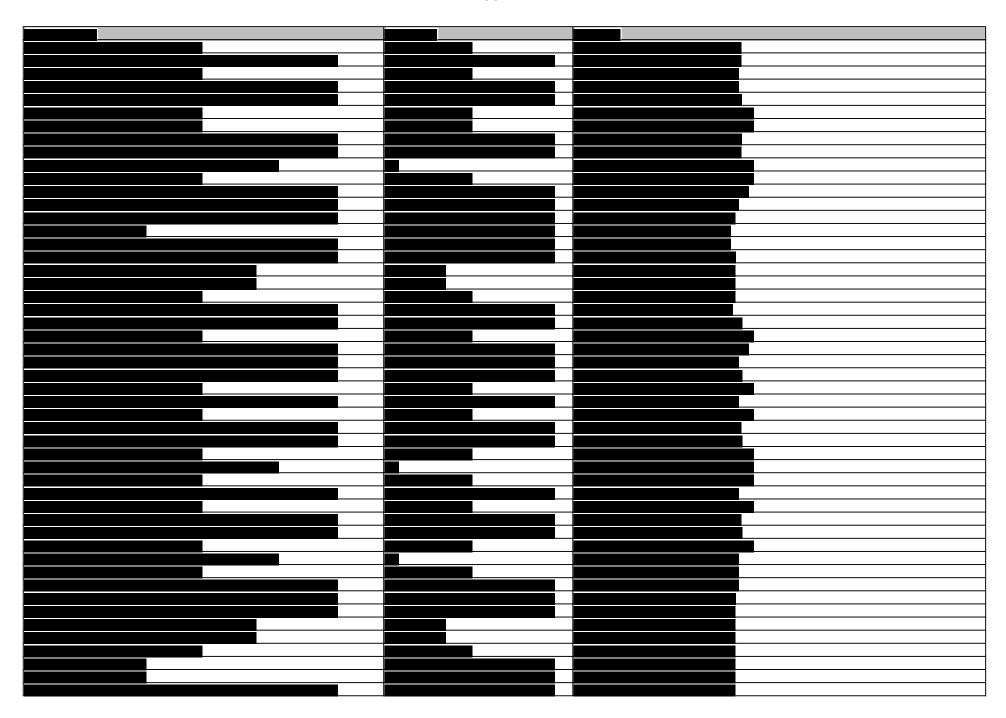


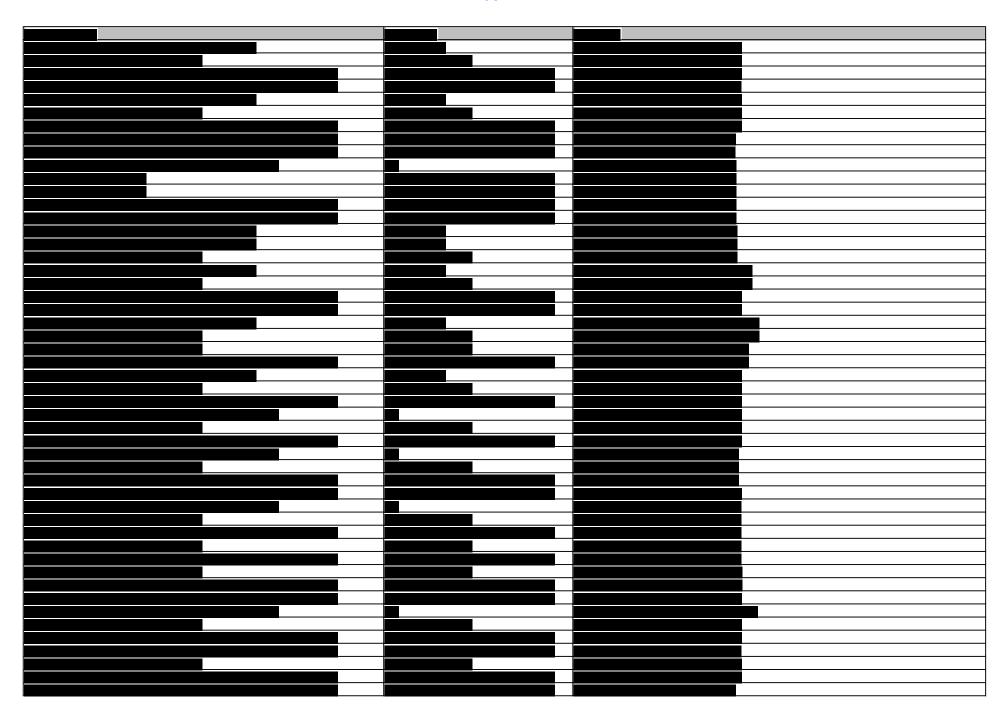


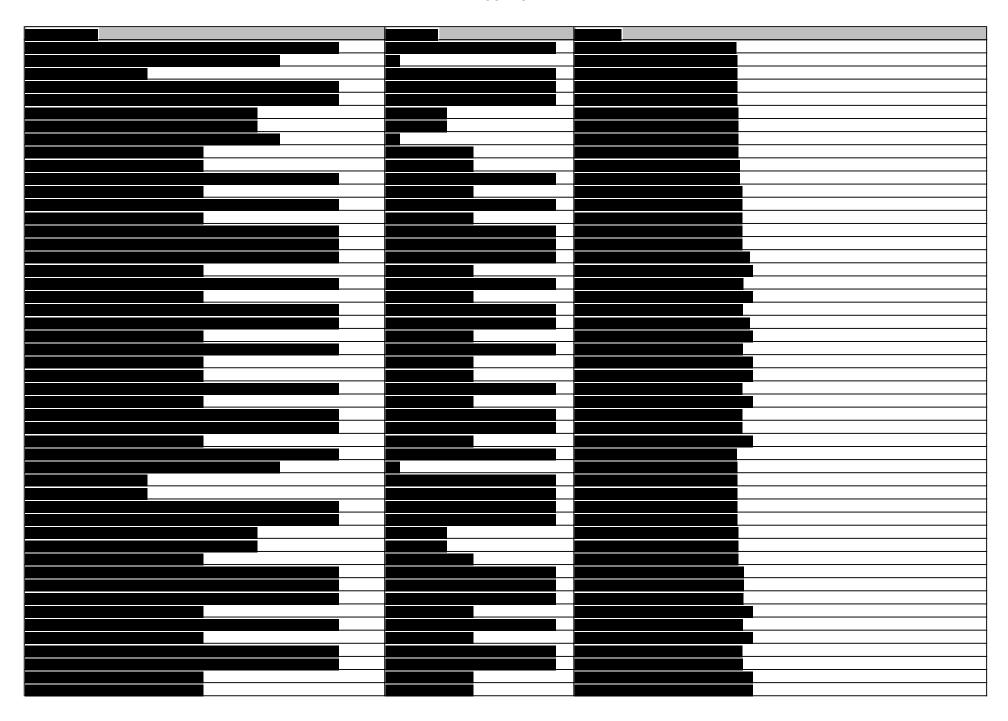


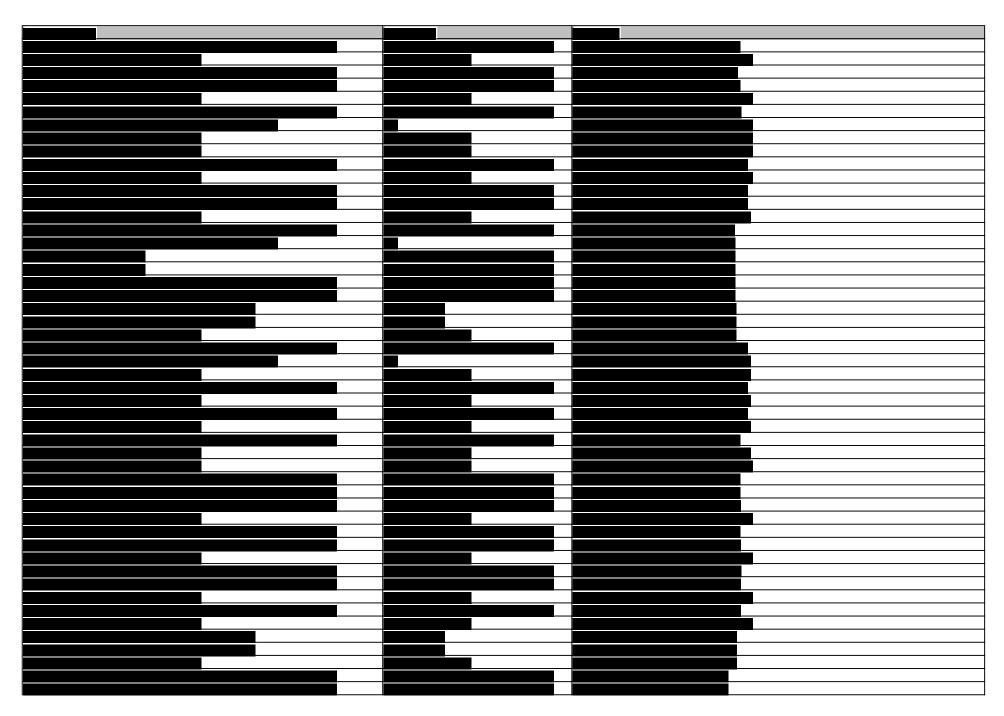
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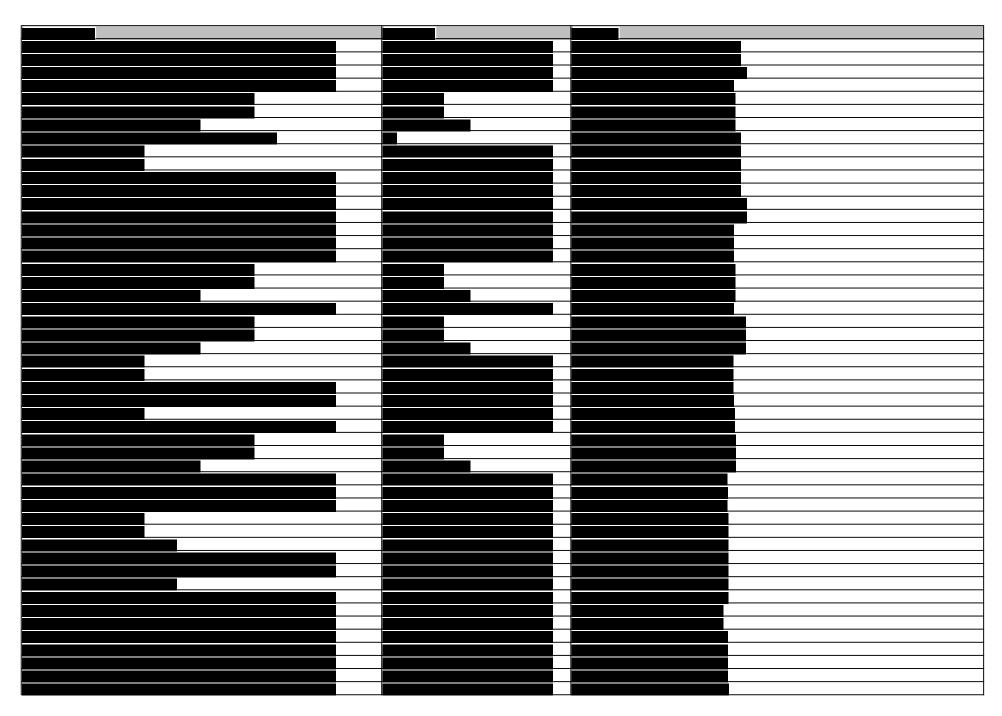






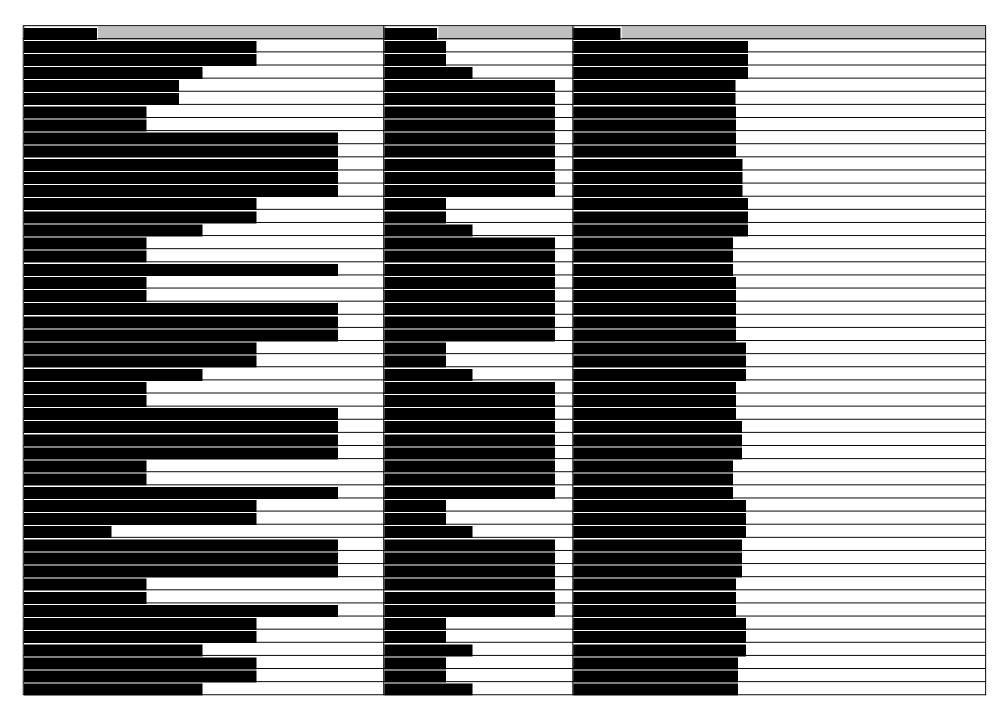


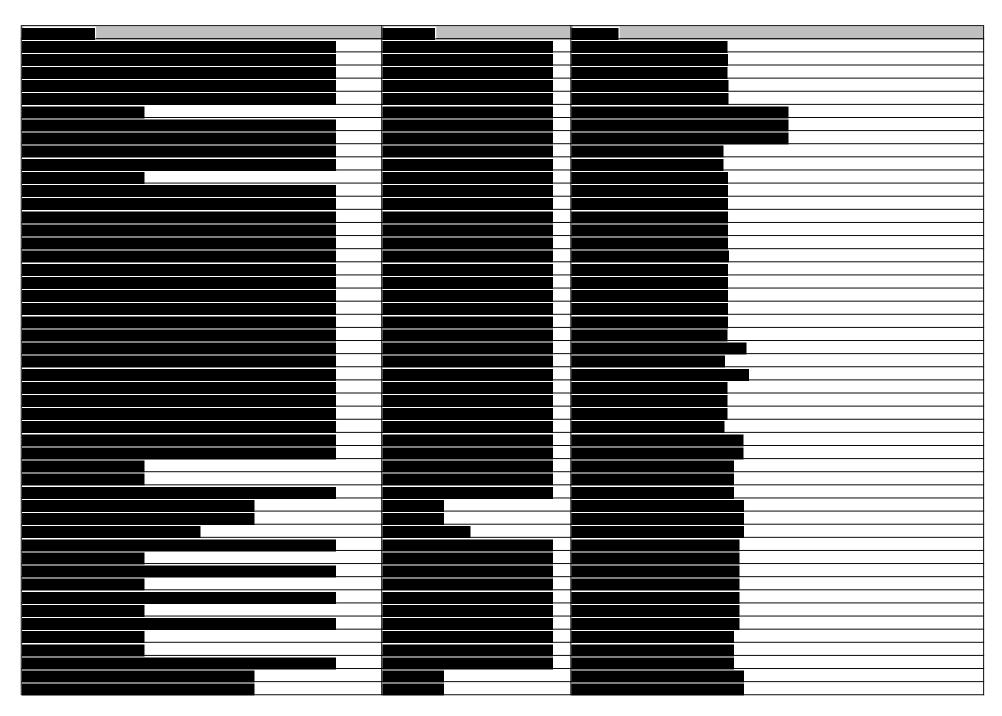


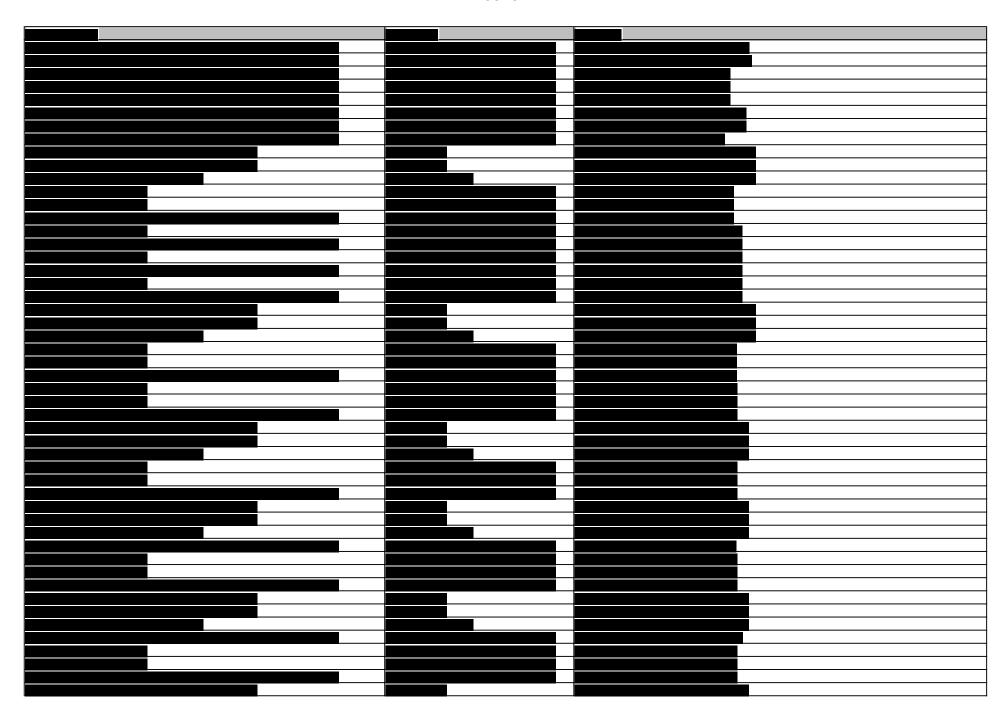


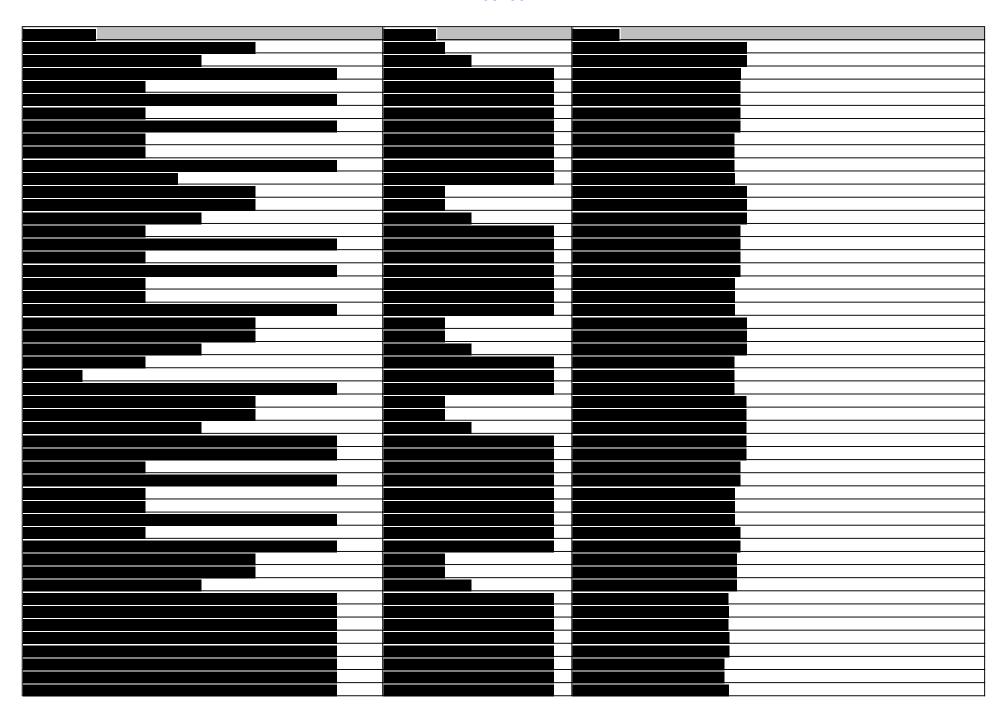










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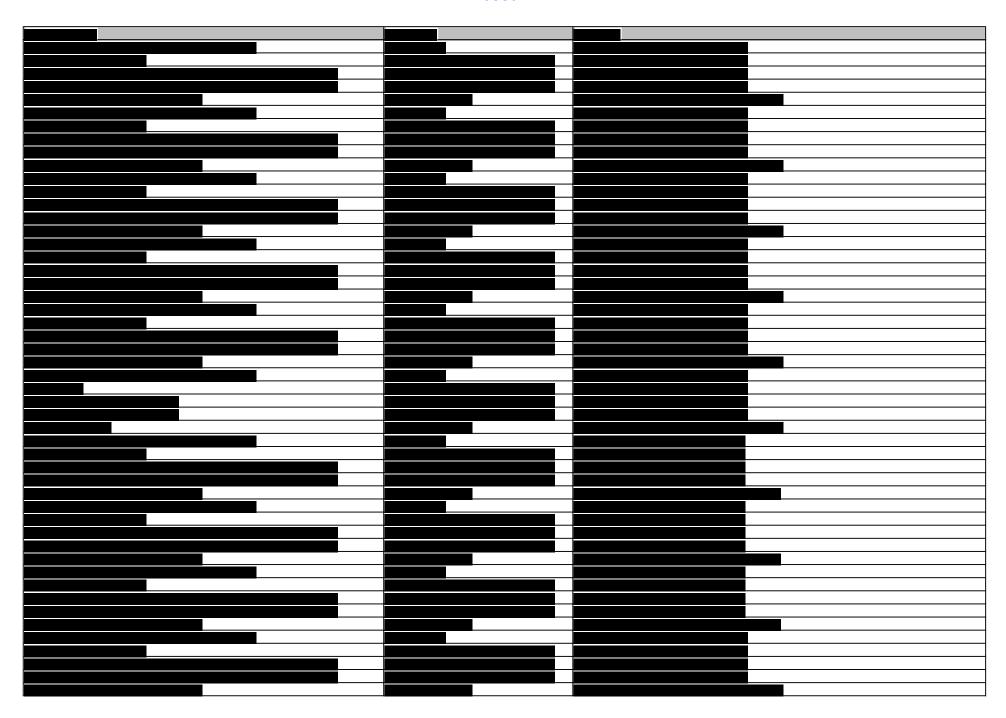


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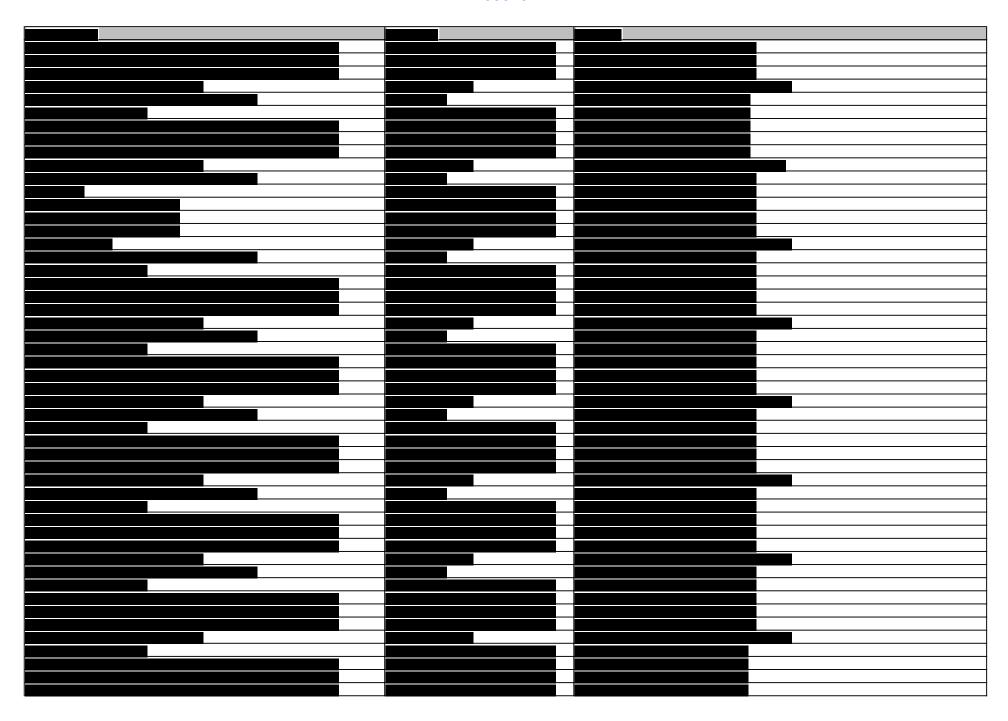

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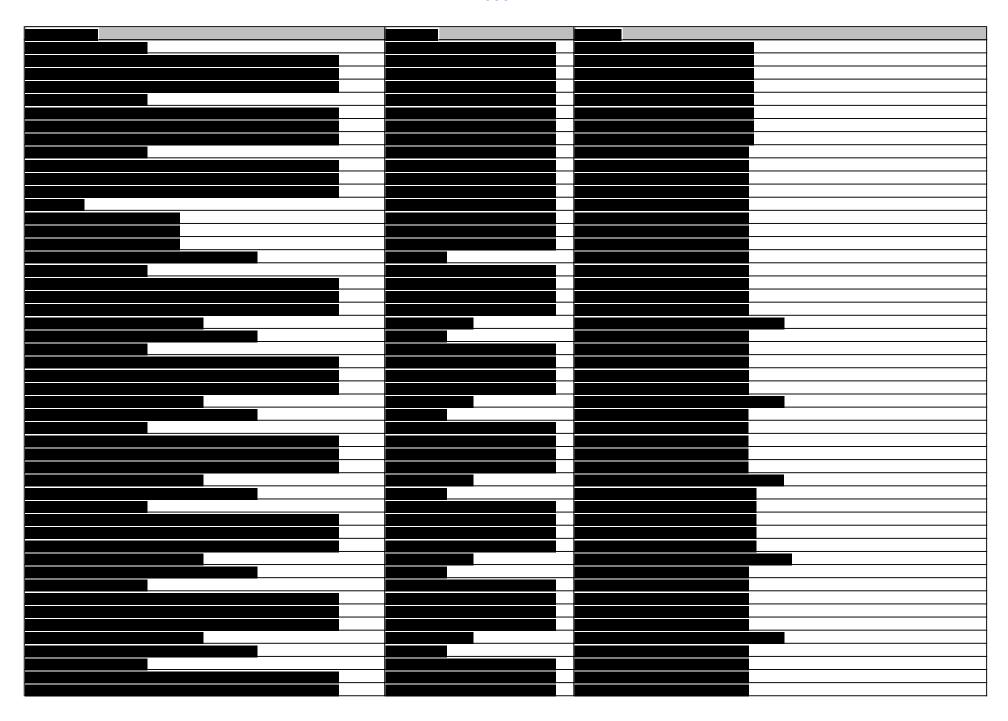
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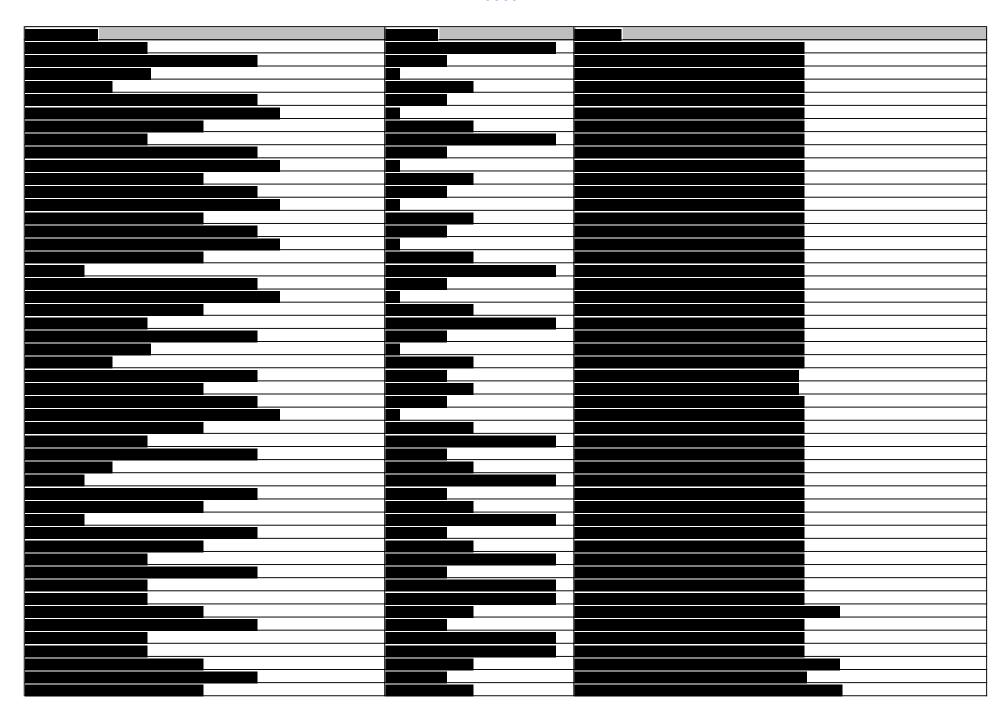


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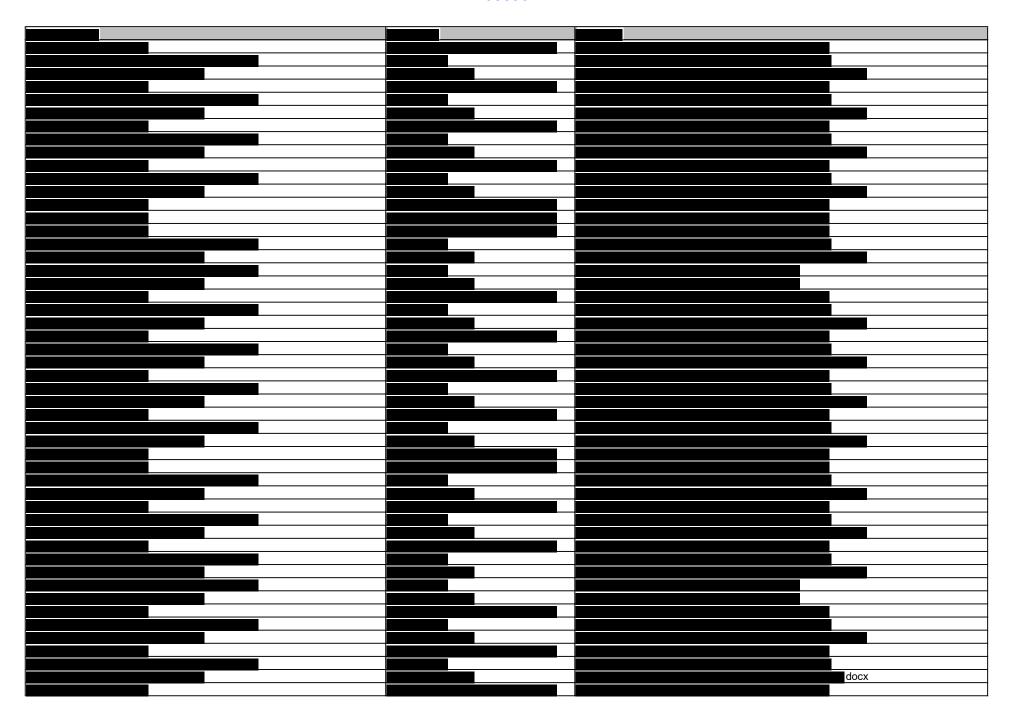
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# EXHIBIT 124

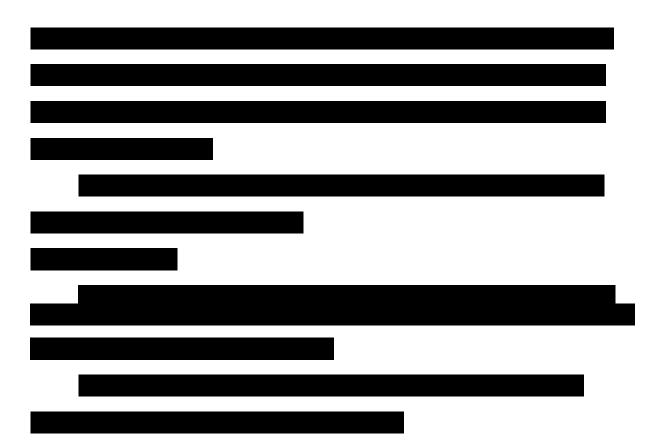
#### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CENTRE GMBH and WEST PUBLISHING	<i>)</i> )
CORPORATION,	) C.A. No. 20-613-LPS
Plaintiffs/Counterdefendants,	) JURY TRIAL DEMANDED
v.	) HIGHLY CONFIDENTIAL – ) ATTORNEYS' EYES ONLY
ROSS INTELLIGENCE INC.,	)
Defendants/Counterclaimant.	)
	MANT ROSS INTELLIGENCE INC.'S AND OBJECTIONS TO PLAINTIFFS' ATERROGATORIES

Case 1:20-cv-00613-SB Document 375-1 Filed 02/23/23 Page 2012 of 2135 PageID #: 95917

Case 1:20-cv-00613-SB Document 375-1 Filed 02/23/23 Page 2017 of 2135 PageID #: 95922

Case 1:20-cv-00613-SB Document 375-1 Filed 02/23/23 Page 2020 of 2135 PageID #: 95925



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Crinesha B. Berry CROWELL & MORING LLP 1001 Pennsylvania Avenue, NW Washington, DC 20004 Tel: (202) 624-2500

Dated: January 11, 2022 7553340 / 50241

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore

David E. Moore (#3983)
Bindu A. Palapura (#5370)
Hercules Plaza, 6<sup>th</sup> Floor
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Wilmington, DE 19801
Tel: (302) 984-6000
dmoore@potteranderson.com
bpalapura@potteranderson.com

Attorneys for Defendant/Counterclaimant ROSS Intelligence, Inc.

## **CERTIFICATE OF SERVICE**

I, David E. Moore, hereby certify that on January 11, 2022, true and correct copies of the within document were served on the following counsel of record at the addresses and in the manner indicated:

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/s/ David E. Moore
David E. Moore

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## EXHIBIT 125

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

	JTERS ENTERPRISE I and WEST PUBLISHING I,	)	
	Plaintiffs and Counterdefendants,	) ) )	C.A. No. 20-613 (LPS)
v.		)	
ROSS INTELLIGENCE INC.,		)	
	Defendant and Counterclaimant.	)	

# PLAINTIFFS AND COUNTERDEFENDANTS THOMSON REUTERS ENTERPRISE CENTRE GMBH AND WEST PUBLISHING CORPORATION'S SECOND SUPPLEMENTAL RESPONSES AND OBJECTIONS TO DEFENDANT AND COUNTERCLAIMANT ROSS INTELLIGENCE INC.'S INTERROGATORY NO. 1

Pursuant to Federal Rules of Civil Procedure 26 and 33 and the Local Rules of the United States District Court for the District of Delaware (the "Local Rules" and each a "Local Rule"), Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH ("Thomson Reuters") and West Publishing Corporation ("West") (collectively "Plaintiffs"), hereby supplement their responses to Defendant and Counterclaimant ROSS Intelligence Inc.'s ("Defendant") Interrogatories, served on May 12, 2021 (the "First Set of Interrogatories" and each individually, an "Interrogatory") in the above-captioned action ("Action") as follows:

## RESPONSES AND OBJECTIONS TO INTERROGATORIES

## **INTERROGATORY NO. 1**:

IDENTIFY the specific portions of the WESTLAW CONTENT that you claim is subject to copyright that ROSS INFRINGES.

## **RESPONSE TO INTERROGATORY NO. 1:**

Plaintiffs incorporate by reference the above-stated General Objections as if fully set forth herein. Plaintiffs specifically object to this Interrogatory as vague and ambiguous to the extent that the phrases "specific portions" and "you claim is subject to copyright" are unclear and undefined. Plaintiffs object to this Interrogatory as overly broad, unduly burdensome, and premature to the extent that it asks Plaintiffs to identify any and all WESTLAW CONTENT owned by Plaintiffs that ROSS has infringed and continues to infringe, without ROSS first responding to Plaintiffs' discovery requests, which will narrow the focus of the parties' discovery efforts to the content actually at issue in this case. Plaintiffs object to this Interrogatory as overly broad and unduly burdensome to the extent that the First Set of Interrogatories define the term "ROSS" overly broadly as indicated in General Objection No. 15. Plaintiffs object to this Interrogatory to the extent that it seeks information that is or will be in the possession of ROSS by referring to documents, taking depositions, or any other means of obtaining discovery in this Litigation that is more convenient, efficient, practical, and less burdensome. Plaintiffs object to this Interrogatory to the extent that it calls for confidential information, trade secrets, or proprietary business information. Plaintiffs will provide such information subject to the Protective Order so ordered by the Court in this case. D.I. 48.

Subject to, as limited by, and without waiver of the foregoing objections, Plaintiffs respond as follows: Thomson Reuters owns copyrights in the content that is part of Westlaw that was created by Plaintiffs' attorney-editors through a rigorous editorial process. As alleged in Plaintiffs'

Complaint, this content includes original Westlaw headnotes and the West Key Number System ("WKNS").

With regard to judicial opinions, the editorial process begins with newly published opinions being divided into different categories that are assigned a priority level by Plaintiffs' attorneyeditors. Priority cases include opinions from the United States Supreme Court, the federal courts of appeals, and the States' highest courts, along with some jurisdictions Plaintiffs have designated. Beginning with the highest priority cases, Plaintiffs' attorney-editors carefully review the opinion to identify concepts discussed by the court that they select to call out as points of law. Each point of law is reflected in a headnote, and each headnote will, ordinarily, contain a single point of law. In some cases, however, multiple points of law may be included in a single headnote to compare and contrast, or to show how they operate in conjunction with each other—this is a decision left to the attorney-editors' discretion.

Many creative choices are made by Plaintiffs' attorney-editors when they create headnotes. For example, headnotes are written to be understood standing alone—*i.e.*, no reference to the opinion or any other headnote should be necessary for it to be understood. Thus, Plaintiffs' attorney-editors write the headnotes so that they summarize only certain, selected facts, and explain in clear language the holding of the court or contentions of the parties. Plaintiffs' attorney-editors will also make the editorial judgment of recommending Key Number topics to assign to headnotes to integrate the new opinion into the West Key Number System. Although Plaintiffs have created tools to assist their attorney-editors in this effort, such as the tool discussed in Plaintiffs' response to Interrogatory No. 12, which Plaintiffs incorporate hereto by reference, it is ultimately Plaintiffs' attorney-editors that arrange the headnotes in the WKNS. Pursuant to Rule 33(d), Plaintiffs incorporate by reference the editorial manual used by Plaintiffs' attorney-editors

for creating headnotes and assigning Key Number topics during the editorial process, which was produced in this Litigation at TR-0002864–TR-0003137.

Plaintiffs' attorney-editors will also create headnotes for the various legal standards, factual holdings, and legal conclusions made by the court, create original synopses and holdings to be included at the beginning of the opinion in Westlaw, and determine which legal topics covered in the opinion and what search terms should be associated with the opinion so it may be integrated into the database of opinions on Westlaw and the WKNS.

After Plaintiffs' attorney-editors have created the headnotes and made initial recommendations of where they might be placed in the WKNS, the opinion is assigned to one or more "classifiers"—attorney-editors who are responsible for classifying headnotes in the WKNS—who actually assign Key Numbers to the headnote (including reassigning the suggested Key Number topics of the headnote writers), and/or send the case back to the original attorney-editor for further review. Senior classifiers also will reorganize parts of the WKNS from time to time. There is nothing that dictates how the WKNS is organized or what keywords are used to express it.

As indicated in the certificates of registration for Westlaw, Thomson Reuters does not claim copyrights in material prepared by a United States Government officer or employee as a part of that person's official duties, including without limitations government edicts, legislative enactments, judicial decisions, or similar types of official legal materials. Pursuant to Federal Rule of Civil Procedure 33(d), Plaintiffs incorporate by reference those certificates, which were produced as Exhibit A to Plaintiffs' Complaint. Plaintiffs also incorporate the deposit copies for those certificates, which were produced in this Litigation at TR-0003138–TR-0033981.

With regard to ROSS's infringement of Plaintiffs' content, ROSS and LegalEase Solutions, LLC ("LegalEase") have agreed to produce in this Litigation documents responsive to Plaintiffs' discovery requests, but Plaintiffs have yet to receive any such documents. Nevertheless, it is Plaintiffs' understanding that, at ROSS's request and with its knowledge and participation, LegalEase created "Memos" using Westlaw. As explained in Section 1.3 of the "Statement of Work II for ROSS Bulk Memos" that was published on May 7, 2020 by ROSS on the website available at https://medium.com/@AndrewArruda/hold-59effcd819b0, each Memo was to contain (1) a "Legal Research Question" created by LegalEase, which the SOW defines as "a question grounded in legal principles," (2) a "Reference List," which the SOW defines as "the list of Case Law included in the Memo," and (3) "a target of at least four (4) and no more than six (6) Quotes," which are defined as "an independent paragraph excerpt from Case Law." It is Plaintiffs' understanding that the questions were based on headnotes from Westlaw that were written by Plaintiffs' attorney-editors. In addition to paraphrasing the headnotes, the Memos' list of cases were selected by Plaintiffs' attorney-editors for that headnote and arranged in Plaintiffs' WKNS hierarchy. It is further Plaintiffs' understanding, based on Mr. Arruda's blog post, that ROSS used the Memos to create the ROSS platform. Pursuant to Federal Rule 33(d), the SOW is incorporated by reference herein as are the memoranda produced by ROSS in this Litigation at ROSS-000000001-ROSS-000175081.

Plaintiffs' discovery efforts in this case are ongoing, and they reserve the right to further supplement this response in light of facts learned during discovery. In particular, once they have the opportunity to review fully the memoranda ROSS recently produced, Plaintiffs will provide a supplemental response to this Interrogatory.

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## **CERTIFICATE OF SERVICE**

I hereby certify that on March 23, 2022, copies of the foregoing were caused to be served upon the following in the manner indicated:

David E. Moore, Esquire Hercules Plaza, 6th Floor 1313 North Market Street Wilmington, DE 19801 Attorneys for Defendant VIA ELECTRONIC MAIL

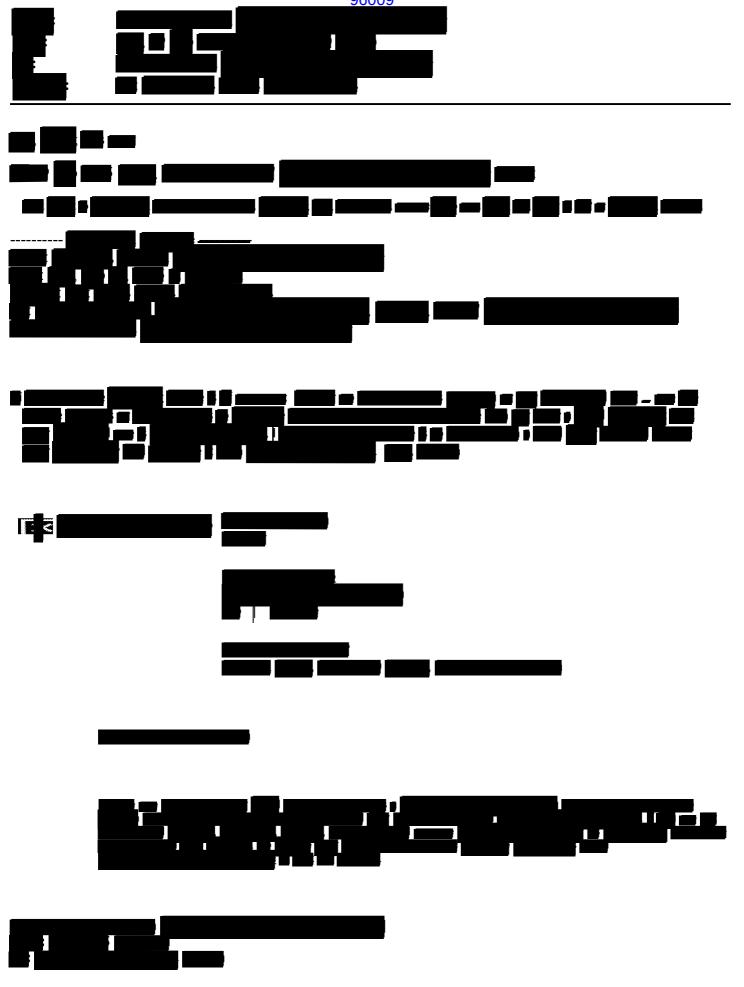
Joshua M. Rychlinski, Esquire Mark A. Klapow, Esquire Lisa Kimmel, Esquire Crinesha B. Berry, Esquire CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington, DC 20004 Attorneys for Defendant VIA ELECTRONIC MAIL

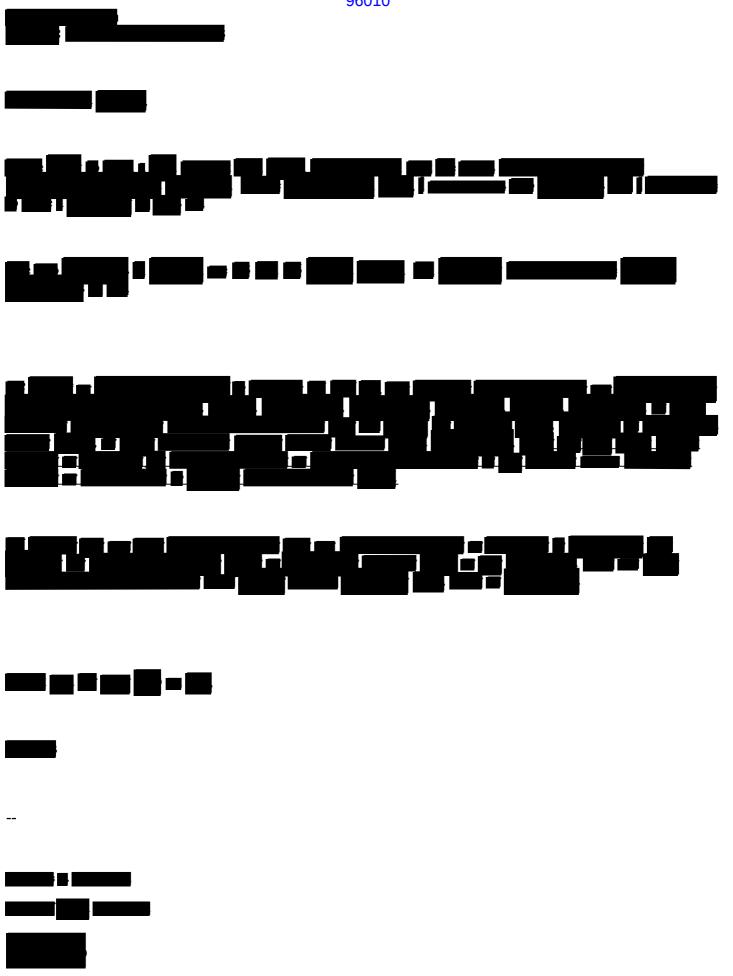
Gabriel M. Ramsey, Esquire Kayvan M. Ghaffari, Esquire Jacob Canter, Esquire Warrington Parker, Esquire CROWELL & MORING LLP 3 Embarcadero Center, 26th Floor San Francisco, CA 94111 Attorneys for Defendant VIA ELECTRONIC MAIL

/s/ Miranda D. Means

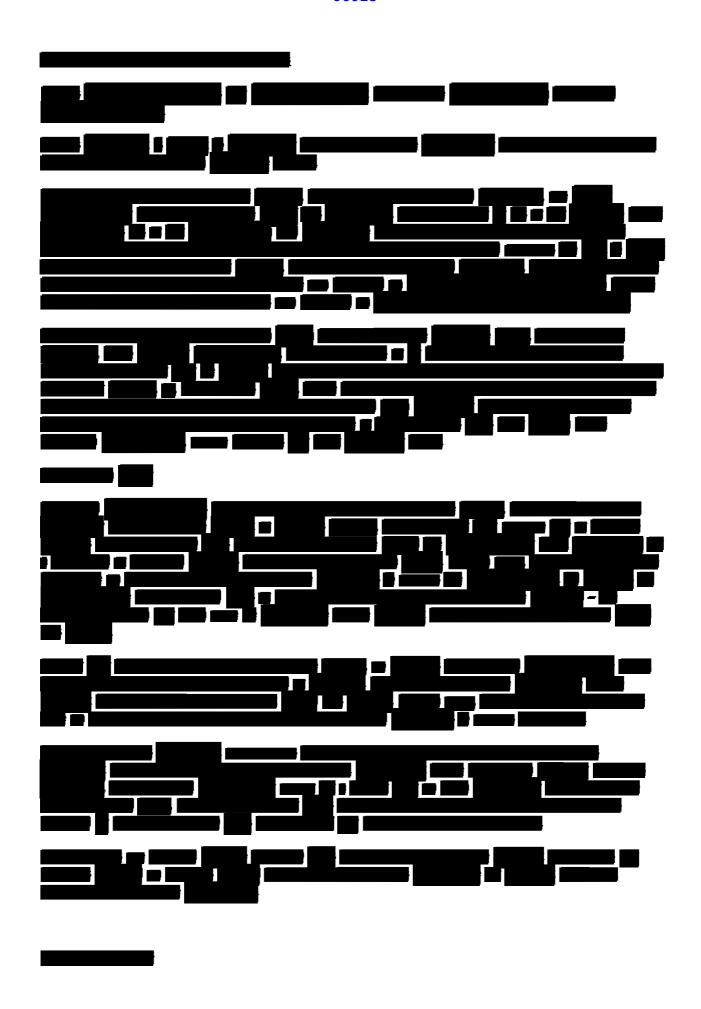
Miranda D. Means

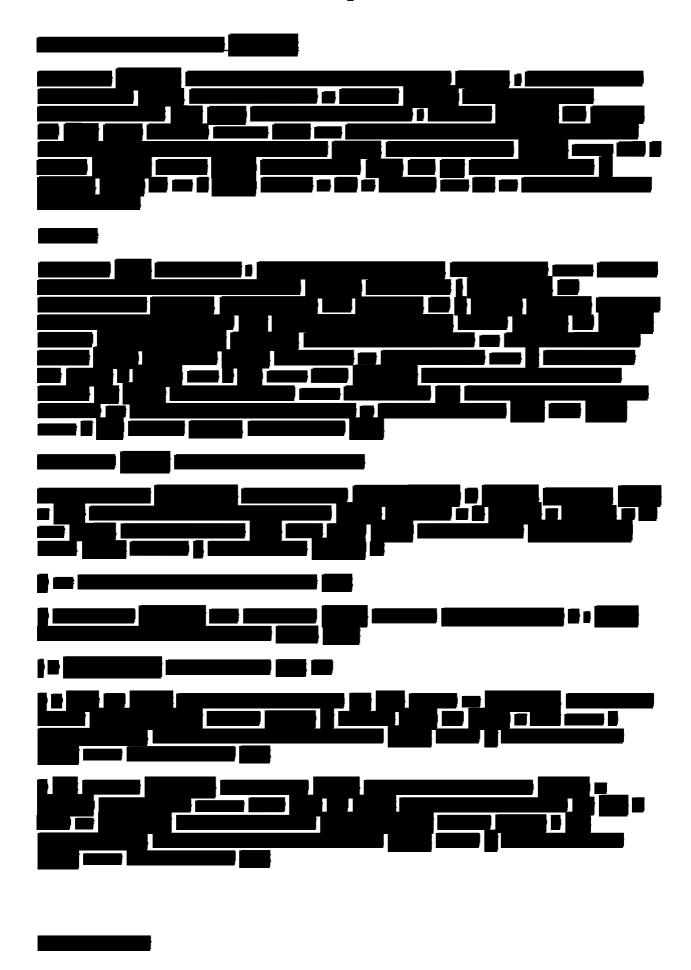
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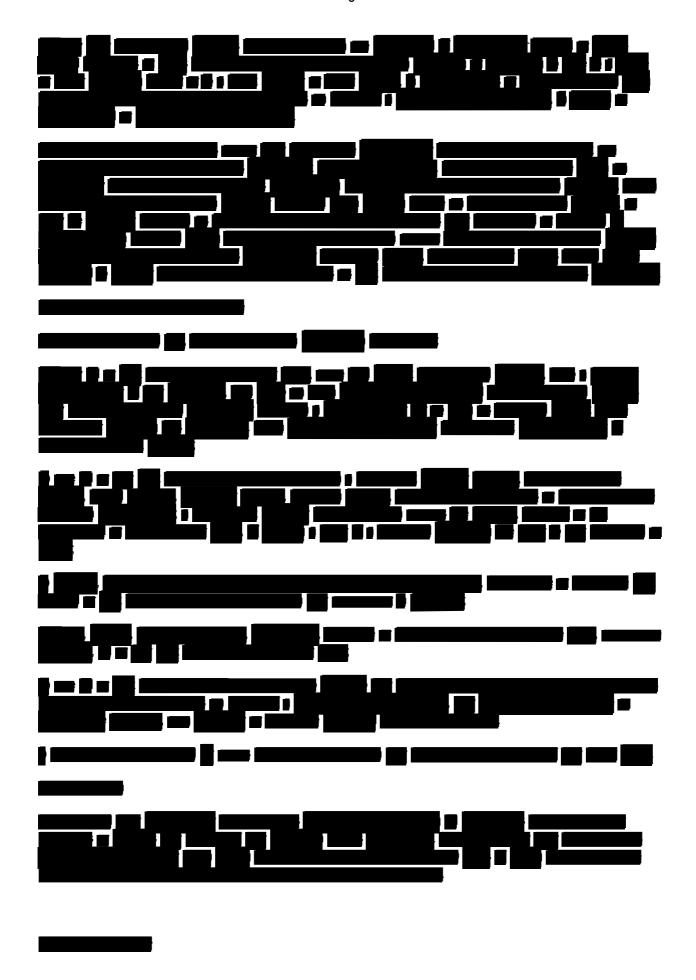




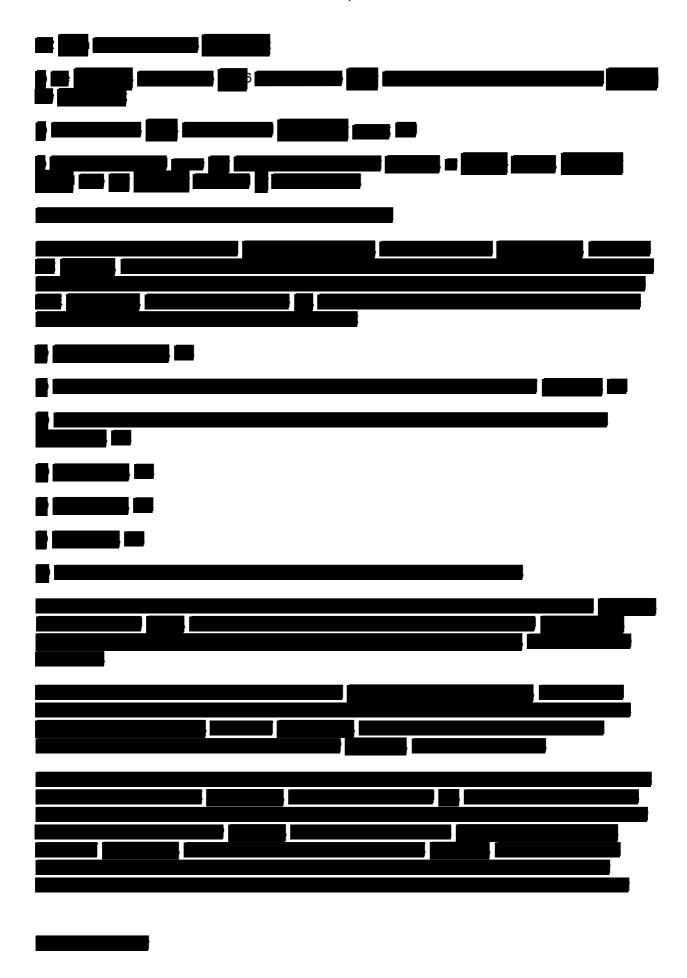
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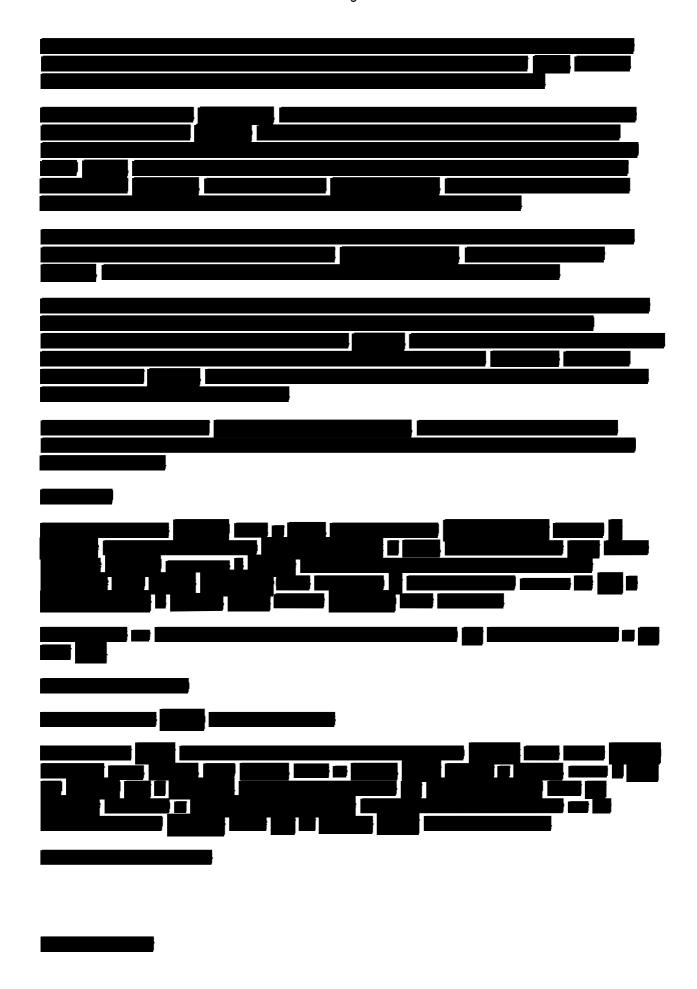


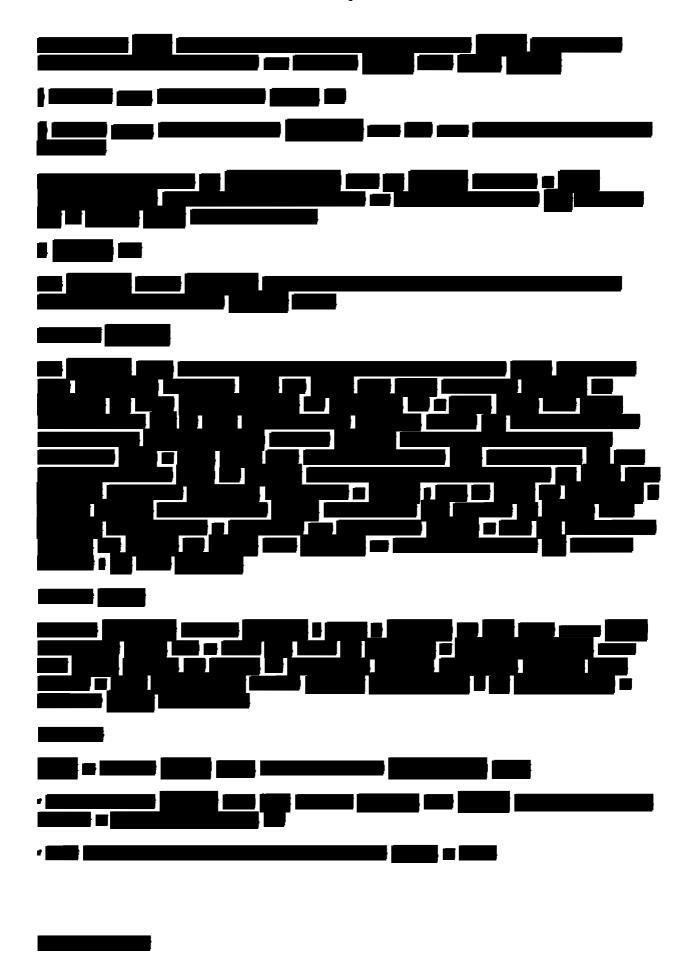




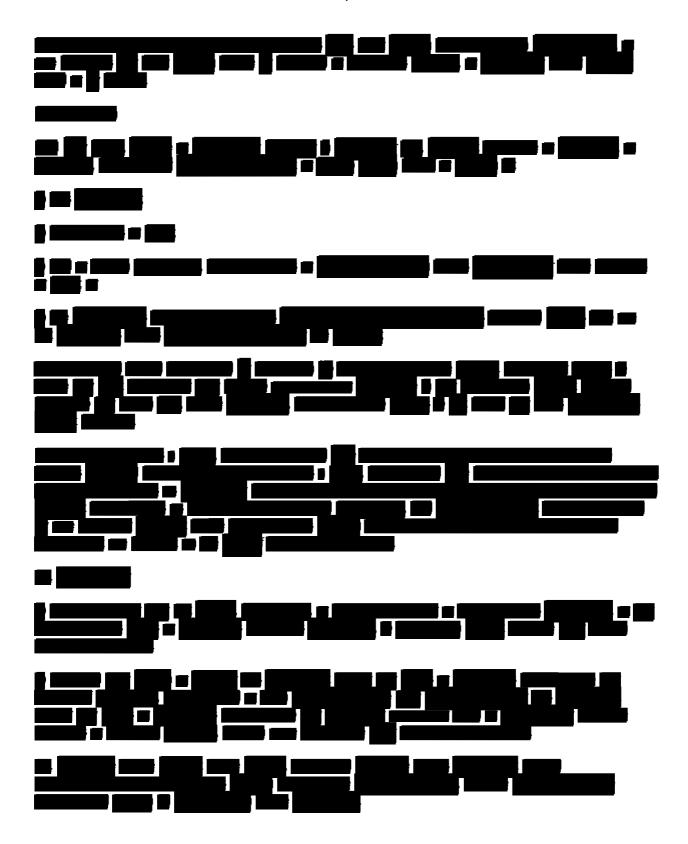
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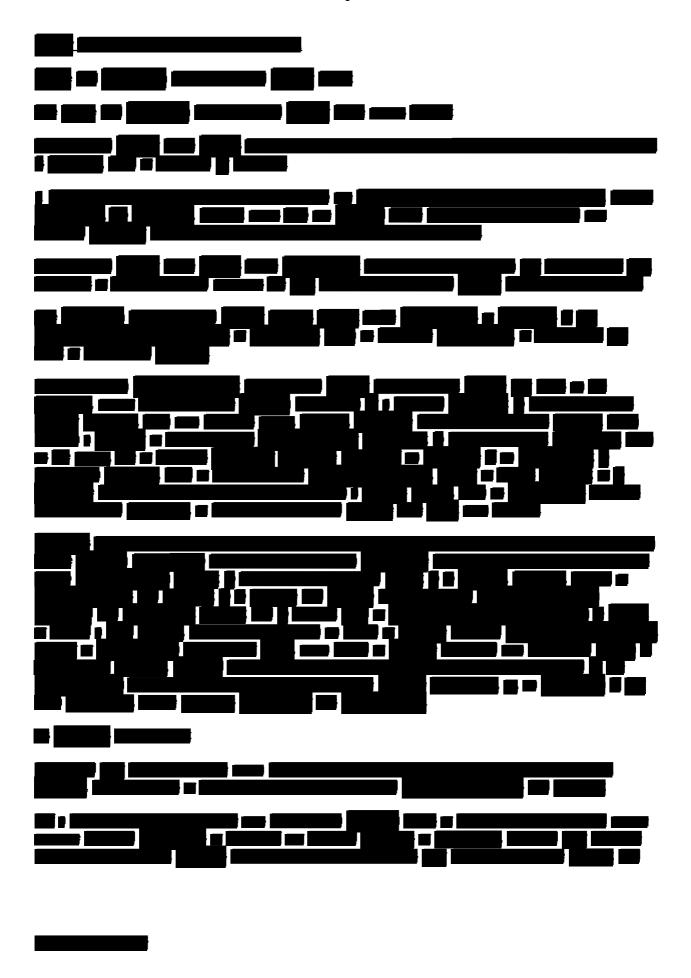


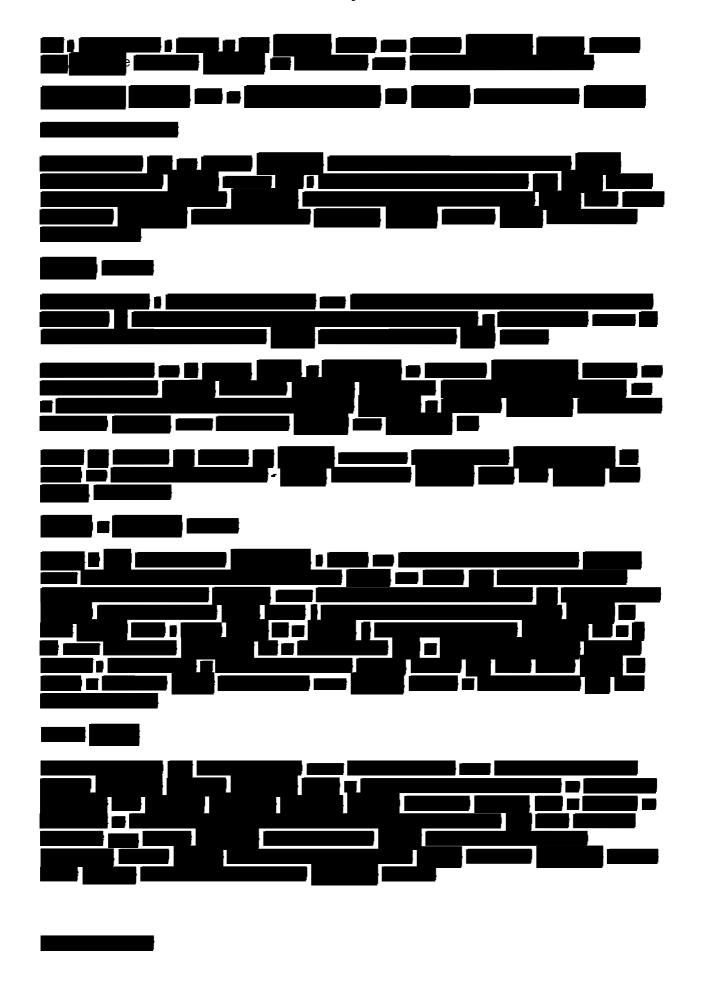




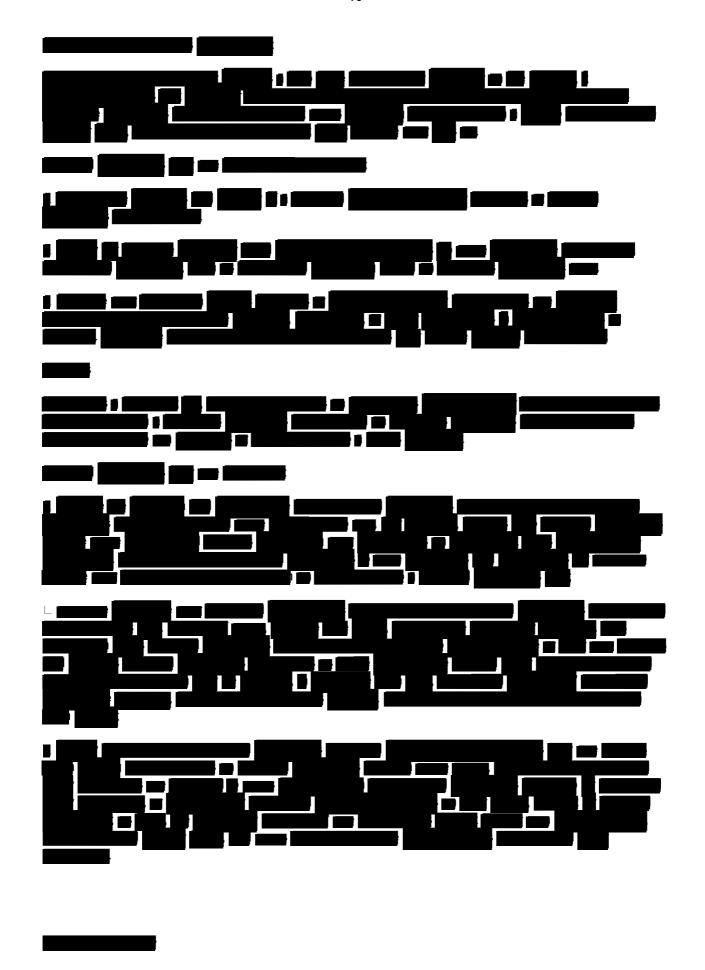


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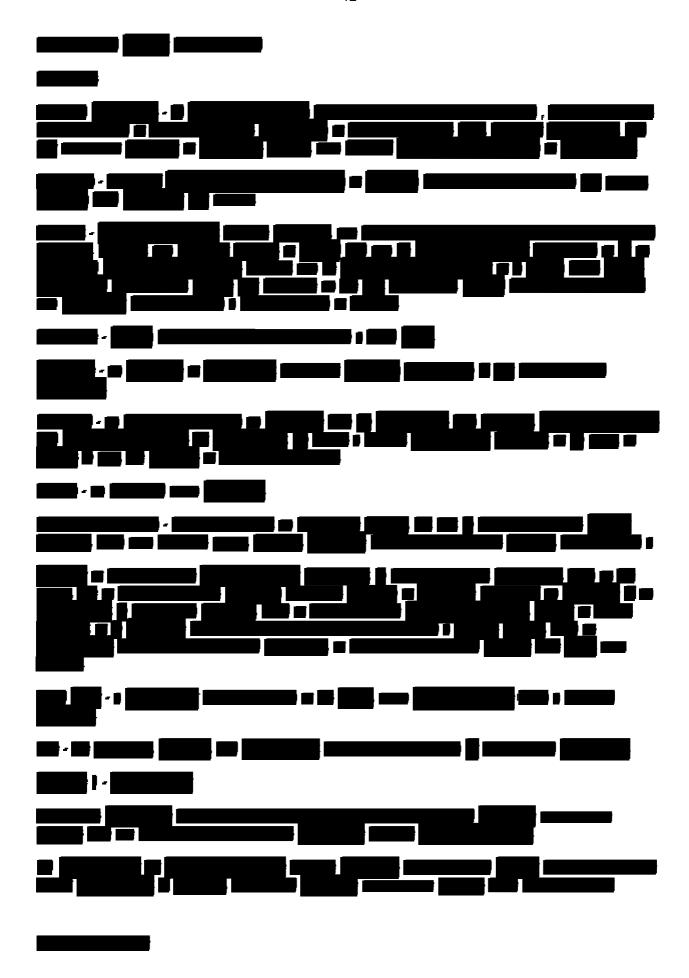


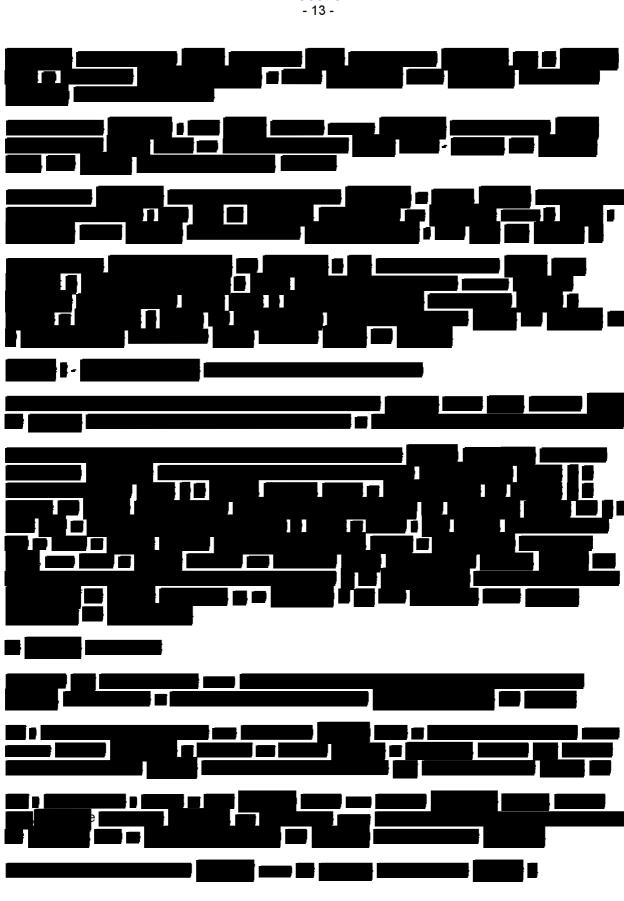
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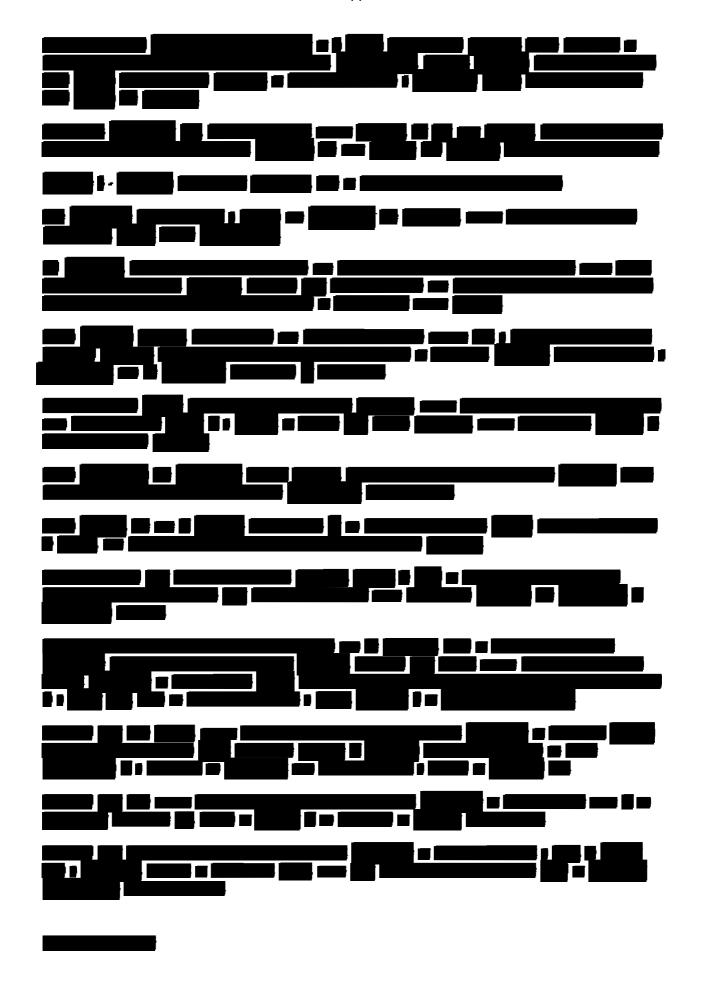


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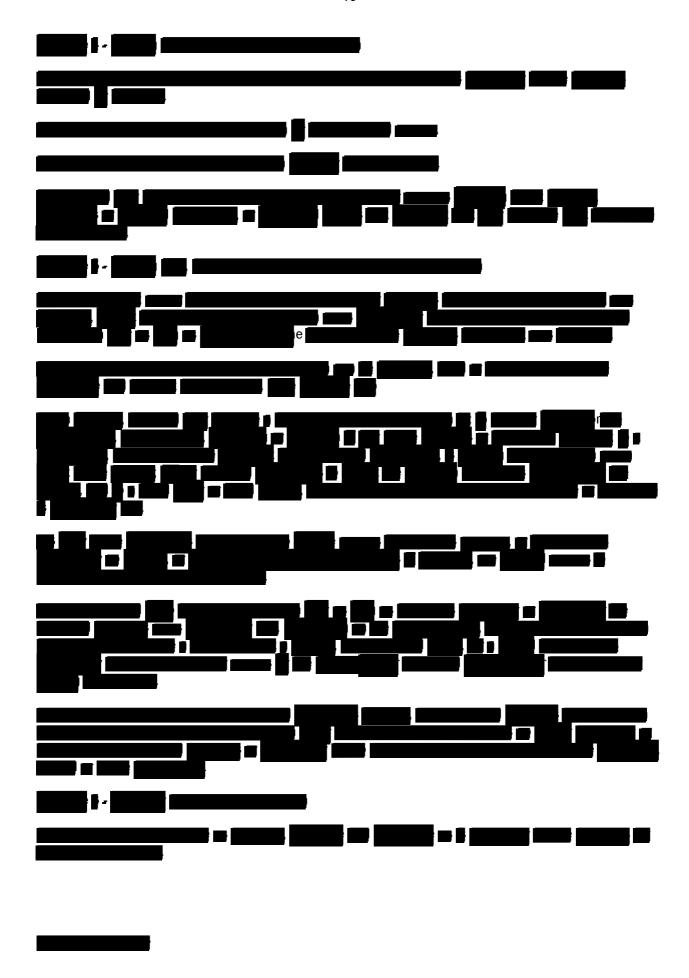




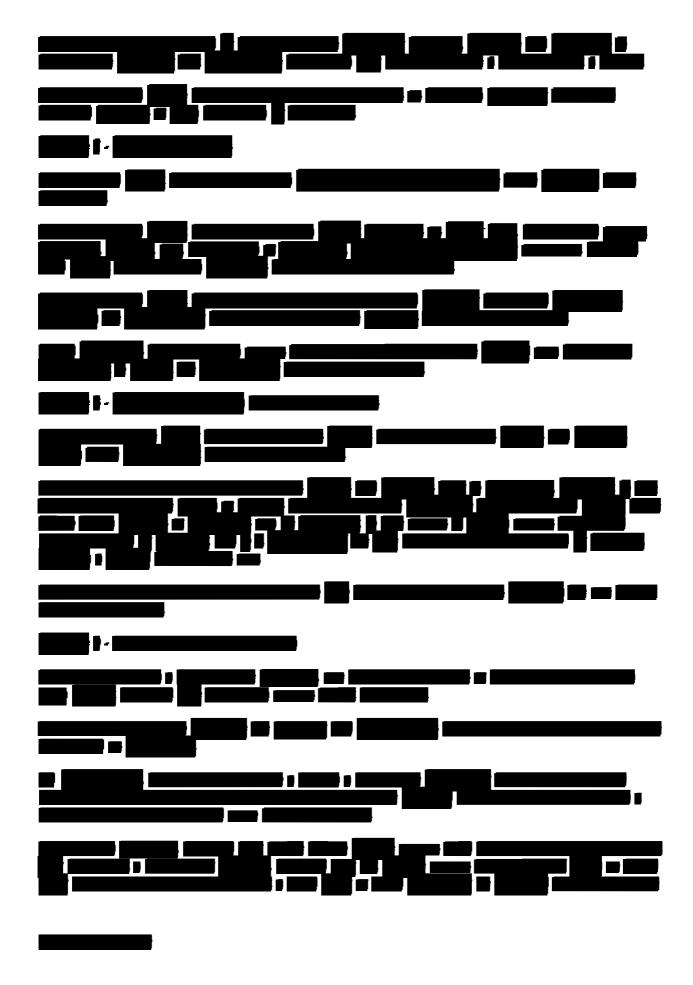
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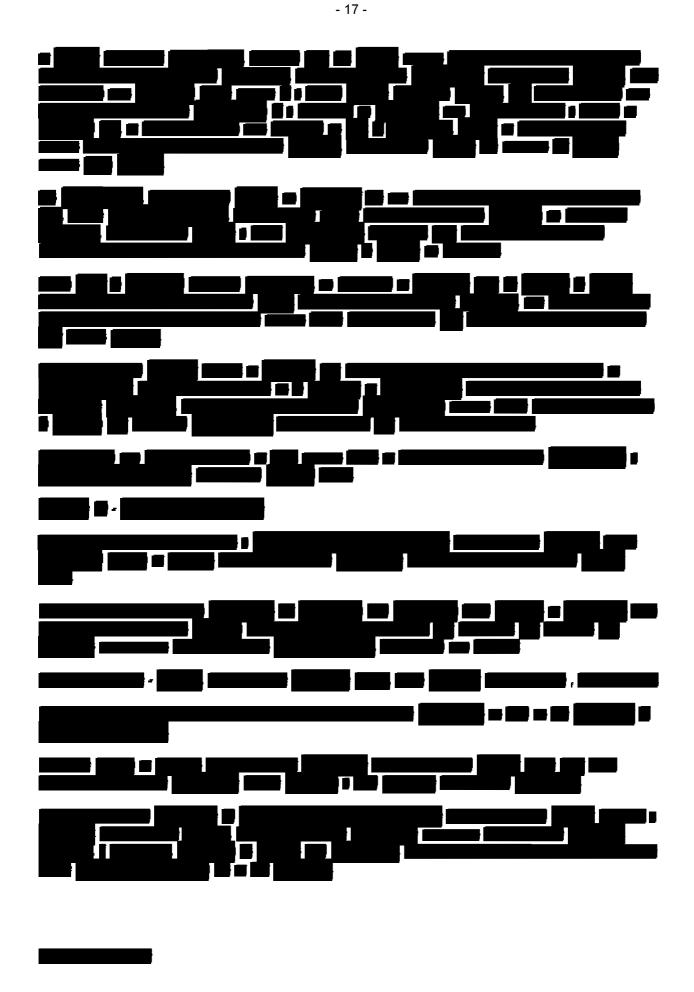


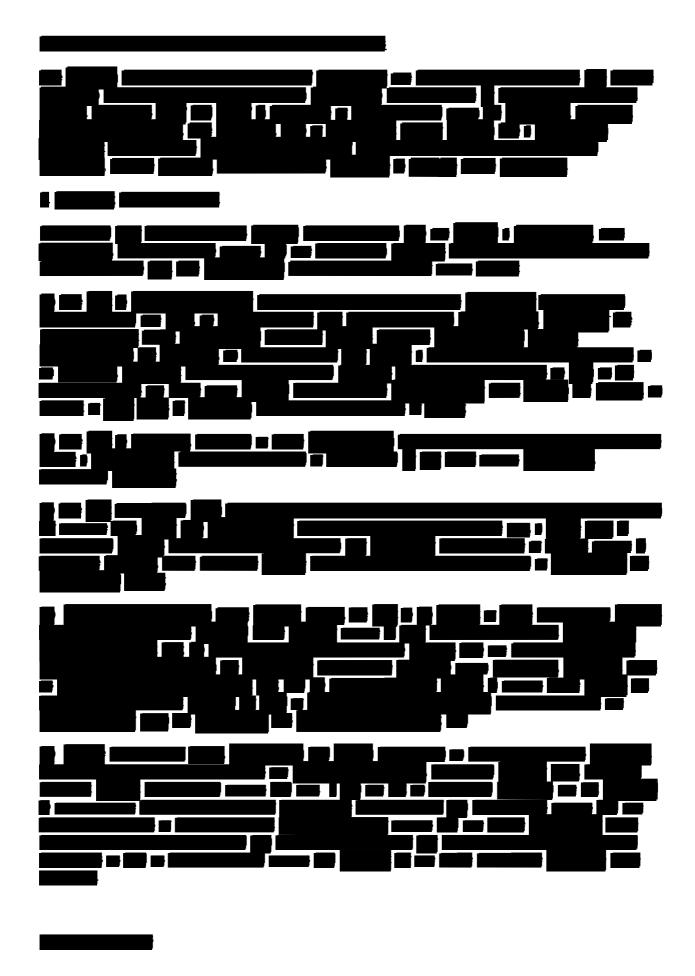
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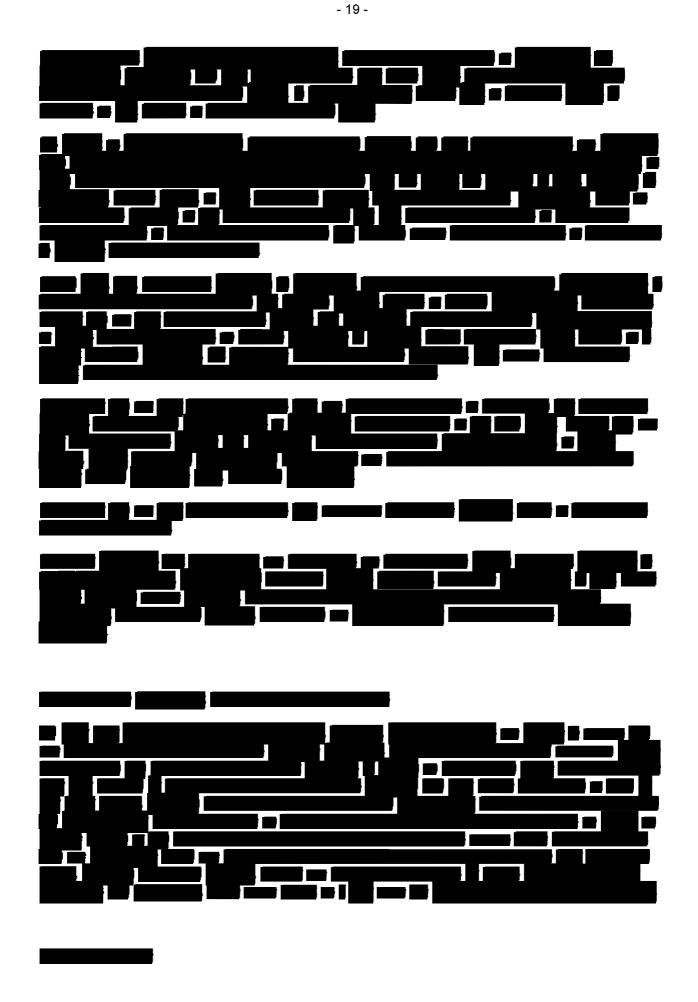


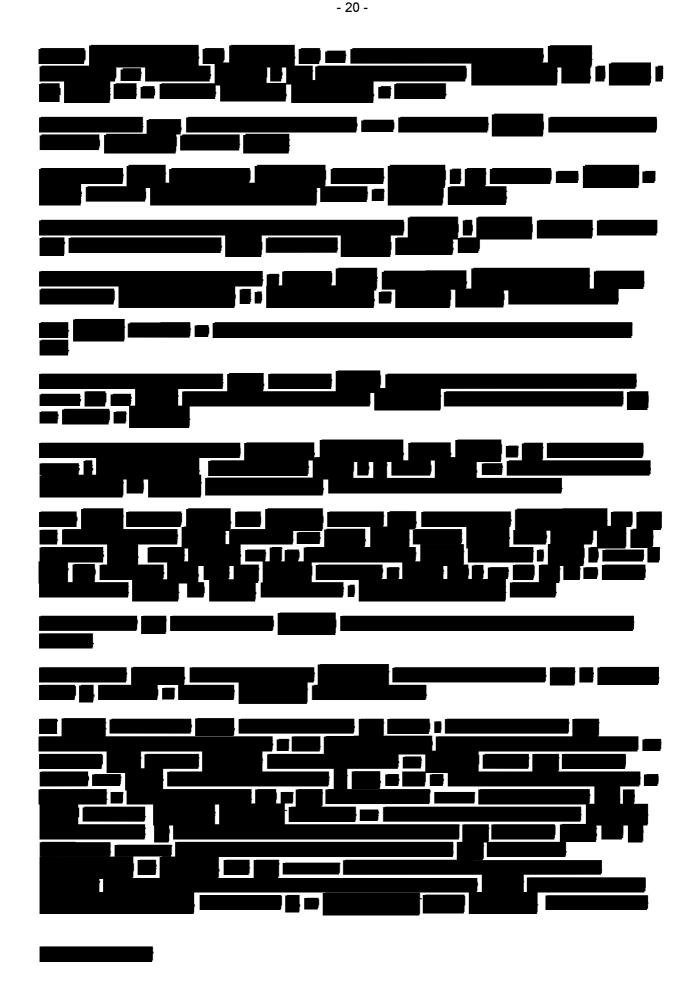


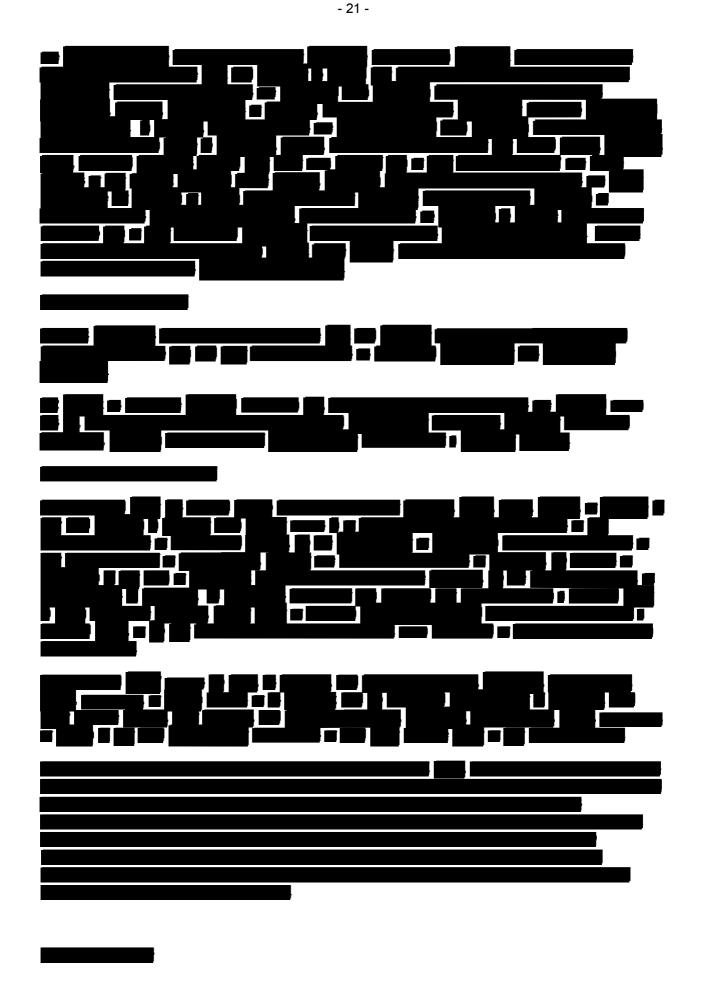


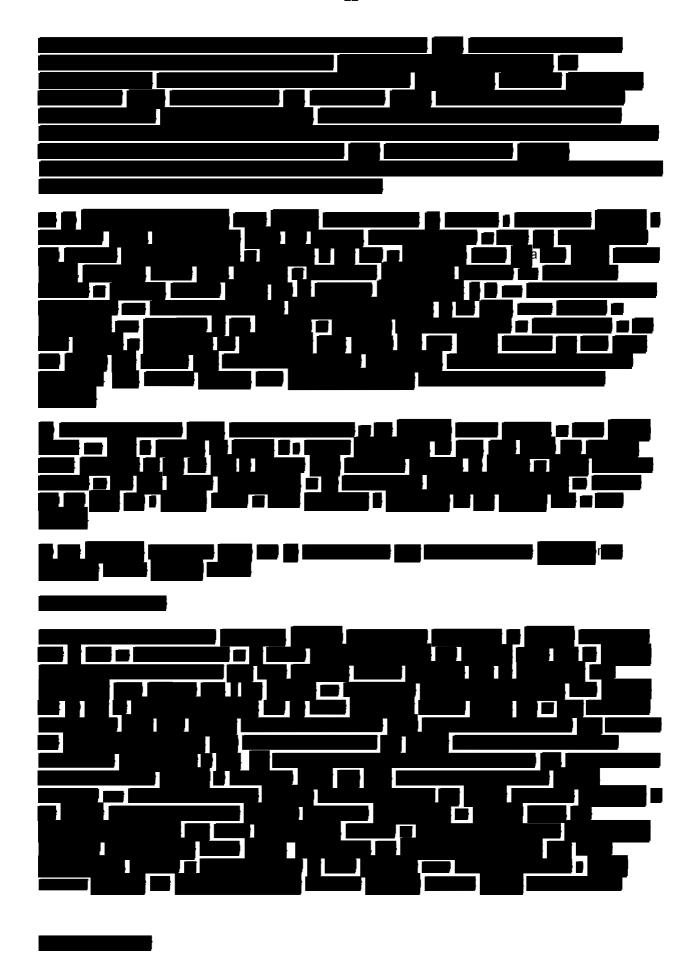


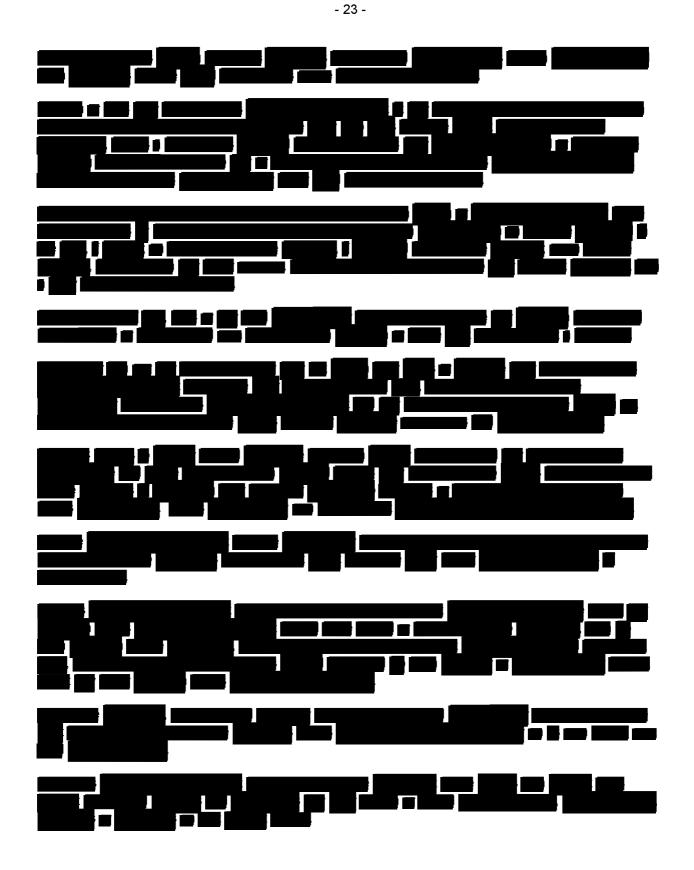




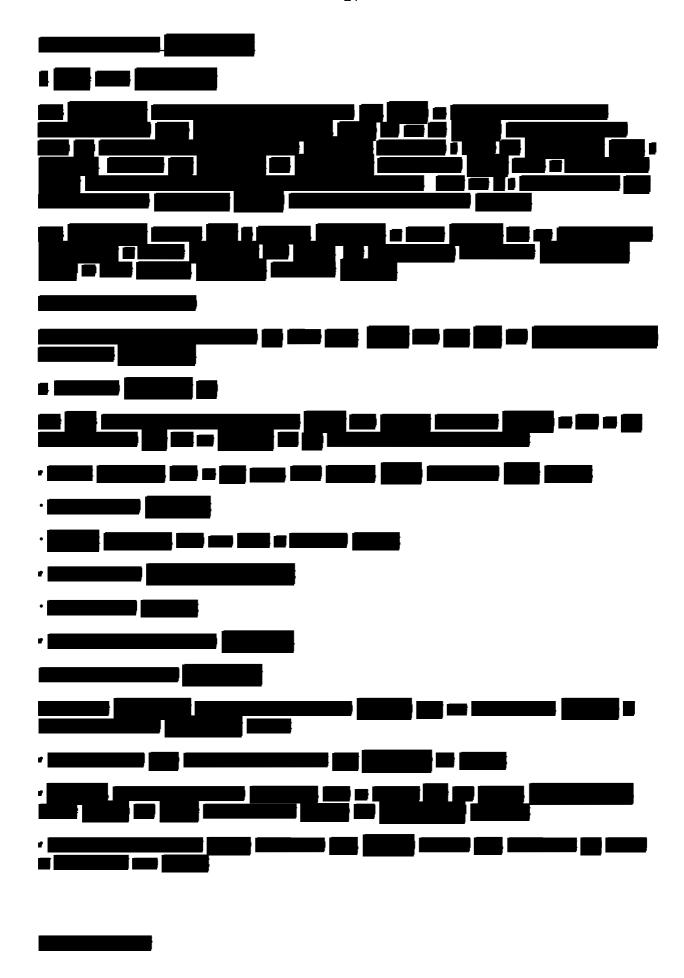




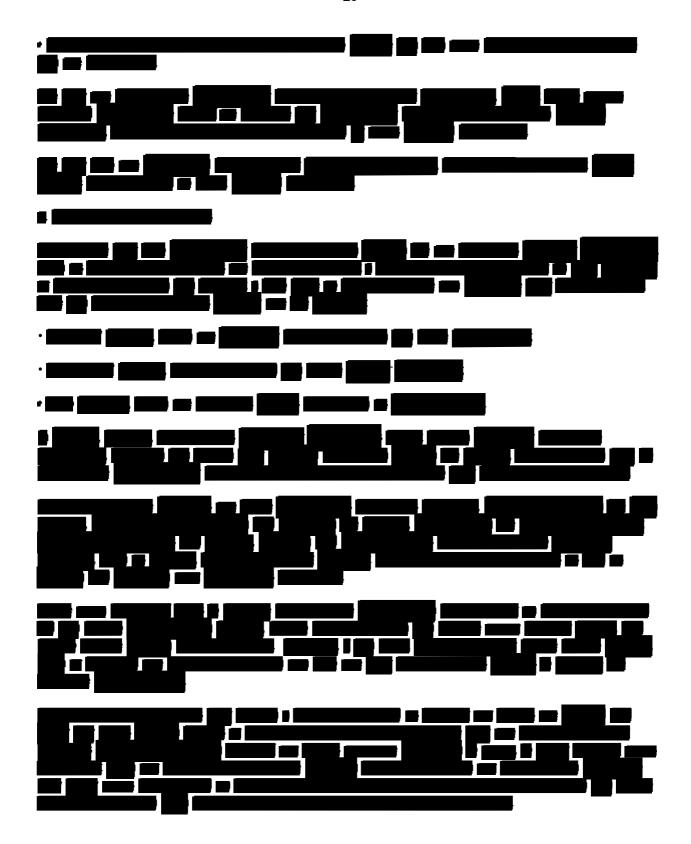




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